

# **EXHIBIT “J”**

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Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	12/10/2019	6	A	1	600.00	1.10	594.00	(Yuanda) receipt and review of letter, S/Complaint to be sent to Yuanda; preparation of correspondence re: same to Steven	ARCH
82489.27817	12/12/2019	6	A	1	600.00	0.10	54.00	(Yuanda) revise Summons	ARCH
82489.27817	01/29/2020	6	A	1	620.00	0.33	184.14	(Yuanda) receipt and review of draft S/C Federal Court	ARCH
82489.27817	02/03/2020	6	A	1	620.00	0.25	139.50	(Yuanda) receipt and review of revised complaint re: declaratory judgment	ARCH
82489.27817	03/10/2020	44	A	4	360.00	0.20	64.80	Review/analyze status of Whitestone v. Yuanda SDNY action, cross-referencing with Federal Rules surrounding default proceedings, and prepare action for next steps towards seeking default judgment on Yuanda.	ARCH
82489.27817	03/12/2020	44	A	4	360.00	0.40	129.60	[Yuanda] Review/analyze Order entered by Judge Gregory Woods re-scheduling the pretrial conference as a phone conference and directing Plaintiff to serve the Order on Yuanda pursuant to the FRCP, preparing said Order for service.	ARCH
82489.27817	03/27/2020	44	A	8	360.00	0.30	97.20	Communicate (other external) (Yuanda): Back and forth email corr. with process server to confirm that the Court's notice regarding the case management telephone conf. was properly served, reviewing the Judge's Order to ensure that same was timely performed.	ARCH
82489.27817	04/07/2020	44	A	3	360.00	0.50	162.00	[Yuanda] Draft, finalize, and file Notice of Appearance for Donald Carbone to ensure that DJC can attend/participate in the Initial Case Management Conference.	ARCH
82489.27817	04/08/2020	44	A	8	360.00	0.30	97.20	[Yuanda] Communicate (other external) : Email to the Court providing the Court with copies of the status letter and and proposed case management plan and scheduling order.	ARCH
82489.27817	04/09/2020	6	A	1	620.00	0.25	139.50	receipt and review of Court order re: conf. call/schedule order; receipt and review of letter to Yuanda re: above; receipt and review of letter to Court re: possible default, scheduling order	ARCH
82489.27817	04/09/2020	44	A	3	360.00	0.30	97.20	[Yuanda] Revise and finalize letter to Yuanda regarding its default in the SDNY Action.	ARCH
82489.27817	04/13/2020	6	A	1	620.00	0.10	55.80	receipt and review of Court notice canceling conf. directing move for default; inter-office conference with Scott re: same	ARCH
82489.27817	04/13/2020	44	A	4	360.00	0.40	129.60	[Yuanda] Review/analyze order from Court regarding Case Scheduling Conference and directing Whitestone to proceed with default motion by May 4th and serve Yuanda with said Order through Federal Rules, cross-referencing with Federal Rules regarding default and COVID-19 procedures put in place by Judge Woods.	ARCH
82489.27817	04/14/2020	6	A	1	620.00	0.66	368.28	receipt and review of Steven's e-mail to Charles, Charles e-mail to Steven; telephone conference with Steven re: status of litigation, etc.; preparation of correspondence Steven re: revised e-mail; receipt and review of court order re: Yuanda attempt to contact court; inter-office conference with Mike M. re: contact Charles and notify him to have Yuanda atty. contact us	ARCH
82489.27817	04/14/2020	44	A	4	360.00	0.30	97.20	[Yuanda] Review/analyze Order signed by Judge Woods providing Whitestone with notice that Yuanda is attempting to appear in the action and directing Yuanda to retain counsel to file an appearance and Whitestone to serve the Order upon Yuanda.	ARCH
82489.27817	04/16/2020	6	A	1	620.00	0.75	418.50	receipt and review of default papers, clerk certificate, proposed judgment, MM affidavit for entry of	ARCH

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<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>								
82489.27817	04/17/2020	44	A	8	360.00	0.70	226.80	ARCH
							default, OSC, memo of law; telephone conference with Mike re: revisions; receipt and review of revised affidavit in support of motion; inter-office conference with MM re: same; preparation of correspondence Steven re: default papers for his review whether Yuanda posted perf. bond [Yuanda] Communicate (other external) : Phone call with FedEx representative regarding service of default letter, re-routing same to alternate addresses for Yuanda in furtherance of seeking default.	
82489.27817	04/23/2020	6	A	1	620.00	0.10	55.80	ARCH
							receipt and review of Atty. Bergles e-mail re: appear for WS	
82489.27817	04/23/2020	44	A	8	360.00	0.20	64.80	ARCH
							[Yuanda] Communicate (other external) : Email corr. with counsel Yuanda regarding its request for a stipulation extending its time to answer.	
82489.27817	04/24/2020	16	A	1	480.00	0.20	86.40	ARCH
							TC with MI and corr. with MM re clerk's default certificate and affidavit in support.	
82489.27817	04/24/2020	48	A	1	465.00	0.40	167.40	ARCH
							Finalized papers for Clerk's Declaration of Default and filed same with the Court	
82489.27817	04/25/2020	48	A	1	465.00	0.40	167.40	ARCH
							Received and reviewed Court notice regarding default filing; revised and re-filed papers pursuant to Court's request	
82489.27817	04/25/2020	6	A	1	620.00	0.20	111.60	ARCH
							follow-up preparation of correspondence Steven re: finalize default papers; receipt and review of response; inter-office conference with McDermott re: same	
82489.27817	04/27/2020	6	A	1	620.00	0.40	223.20	ARCH
							e-mail exchange Steven re: Yuanda settlement discussions; receipt and review of Steven's draft to Yuanda; preparation of correspondence Steven re: good to go	
82489.27817	04/27/2020	44	A	4	360.00	0.20	64.80	ARCH
							[Yuanda] Review/analyze email corr. with Yuanda regarding settlement proposal to assess next steps.	
82489.27817	04/27/2020	44	A	4	360.00	0.40	129.60	ARCH
							[Yuanda] Review/analyze SDNY filing of Proposed Clerk's Certificate in furtherance of default and clerk notes regarding said filing.	
82489.27817	04/28/2020	48	A	1	465.00	2.50	1,046.25	ARCH
							Received and reviewed executed Clerk's Certificate of Default; Finalized and filed motion for default; received and reviewed defendant's notice of appearance and letter to Court; received and reviewed Court notices regarding filing of motion for default	
82489.27817	04/28/2020	44	A	4	360.00	0.30	97.20	ARCH
							[Yuanda] Review/analyze pleadings and exhibits in furtherance of filing default motion against Yuanda.	
82489.27817	04/28/2020	44	A	4	360.00	0.30	97.20	ARCH
							[Yuanda] Review/analyze email corr. and phone calls from counsel for Yuanda regarding its default in the SDNY action.	
82489.27817	04/28/2020	44	A	4	360.00	0.40	129.60	ARCH
							[Yuanda] Review/analyze notices from Court regarding filing and adjustments to default motion filed against Yuanda.	
82489.27817	04/28/2020	44	A	4	360.00	0.20	64.80	ARCH
							[Yuanda] Review/analyze signed Clerk's Certificate in furtherance of moving for default against Yuanda USA Corporation.	
82489.27817	04/29/2020	48	A	1	465.00	3.00	1,255.50	ARCH
							Received and reviewed Court Order regarding telephone conference and email and telephone conference with defendant's attorney regarding same; review of letters to the Court by both parties; drafted response to defendant's letter to the Court; conferences with DC and CR regarding same; prepared and filed notice of appearance; review of correspondence between client and adversary	
82489.27817	04/29/2020	6	A	1	620.00	2.00	1,116.00	ARCH
							receipt and review of Yuanda's atty. 4/28 letter to court re: default; preparation of correspondence responding; receipt and review of N of Appearance	

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 3

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 82489.27817 Whitestone Construction, Corp.								
							Yuanda atty.; receipt and review of added e-mail voice message; inter-office conference with Chris re: date answer was due; receipt and review of Steven's response to Charles; preparation of correspondence responding, add disclaimer; telephone conference with Chris re: old PCO reflects present problem; speak to James Dearth; receipt and review of Steven e-mail to Mike re: credit; preparation of correspondence responding; receipt and review of court order re: 5/1 conf.; receipt and review of Schiller's 4/29 letter to the Court re: sanctions - misstatements; inter-office conference with Mike McDermott re: same; inter-office conference with Chris re: Yuanda atty. N of Appearance incorrectly filed; receipt and review of H. Berglas e-mail 4/29; inter-office conference with Mike McDermott re: same	
82489.27817	04/29/2020	44	A	4	360.00	0.30	97.20 [Yuanda] Review/analyze letter correspondence from counsel for Yuanda regarding default motion being filed against Yuanda.	ARCH
82489.27817	04/29/2020	44	A	4	360.00	0.30	97.20 [Yuanda] Review/analyze follow up letter from counsel regarding default motion, requesting that same be withdrawn.	ARCH
82489.27817	04/29/2020	44	A	4	360.00	0.90	291.60 [Yuanda] Review/analyze court docket to assess full history of filings surrounding Yuanda's default and prepare synopsis of timing for relevant filings as the Parties proceed towards the Court's May 1st conference.	ARCH
82489.27817	04/29/2020	44	A	4	360.00	0.30	97.20 [Yuanda] Review/analyze Court Order regarding Yuanda's purported appearance in the action, whether the Court finds same to be sufficient, and interplay between said orders and the back and forth letter correspondence between the parties surrounding Yuanda's continued default.	ARCH
82489.27817	04/29/2020	44	A	4	360.00	0.40	129.60 [Yuanda] Review/analyze back and forth letter and email corr. with counsel for Yuanda, whereby counsel purports to threaten sanctions, demands vacatur of default, and seeks to frame Whitestone's conduct as being bad-faith, cross-referencing same with timing of filings and allegations contained therein, to assess next steps.	ARCH
82489.27817	04/29/2020	44	A	3	360.00	0.50	162.00 [Yuanda] Draft/revise email corr. responding to counsel for Yuanda, asserting that Whitestone should be subject to sanctions, cross-referencing same with client documents and court docket.	ARCH
82489.27817	04/29/2020	44	A	3	360.00	1.20	388.80 [Yuanda] Revise letter correspondence to Judge Woods concerning Yuanda's allegations of bad-faith and its continued default in the dispute, in order to establish that Yuanda remains in default.	ARCH
82489.27817	04/30/2020	48	A	1	465.00	0.40	167.40 Reviewed and revised responses to defendants' two letters, one to Court and one to us; conference with DC regarding further revisions	ARCH
82489.27817	04/30/2020	6	A	1	620.00	1.33	742.14 finalize draft letter to court responding both to Schiller 4/29 and Berglas e-mail 4/29; receipt and review of legal memo re: WS unable to build project per shop drawings; revise letter to court; e-mail response; inter-office conference with Mike McDermott re: same	ARCH
82489.27817	04/30/2020	44	A	4	360.00	0.20	64.80 [Yuanda] Review/analyze Court Order in preparation for May 1st teleconference with Judge Woods.	ARCH
82489.27817	05/01/2020	48	A	1	465.00	1.40	585.90 Preparation for Court conference - review of filings and conference with DC; review of today's Court Order and conference with DC regarding Court conference; research regarding defendant's liability	ARCH

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 4

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 82489.27817 Whitestone Construction, Corp.								
82489.27817	05/01/2020	6	A	1	620.00	1.33	742.14	ARCH
							for costs in seeking default and conferences with DC regarding same; reviewed defendant's new notice of appearance	
82489.27817	05/01/2020	44	A	4	360.00	0.30	97.20	ARCH
							review of court docket, various Orders, letter, etc. to prep. for court telephone conference today; conf. call with court, Yuanda atty. re: schedule motions; inter-office conference with Mike re: legal research [Yuanda] Review/analyze notice of appearance filed by new counsel for Yuanda, cross-referencing with prior appearances, in furtherance of conference scheduled for today.	
82489.27817	05/04/2020	48	A	1	465.00	0.40	167.40	ARCH
							Conference with DC regarding default proceedings, case background and strategy going forward	
82489.27817	05/04/2020	48	A	1	465.00	0.10	41.85	ARCH
							Review of email from client to GC in regarding warranty and other issues	
82489.27817	05/04/2020	6	A	1	620.00	1.00	558.00	ARCH
							inter-office conference with M. McDermott re: factual background of dispute Sciamme/Yuanda - 2 diff. forums lawsuits; receipt and review of Steven's e-mail regarding Notice Proceed under Protest, Yuanda Warranty; preparation of correspondence responding	
82489.27817	05/06/2020	48	A	1	465.00	0.10	41.85	ARCH
							Review of email from DC to Yuanda's attorney regarding possible resolution of default	
82489.27817	05/06/2020	6	A	1	620.00	0.25	139.50	ARCH
							preparation of correspondence Yuanda atty. re: avoid unnecessary motion practice, get on same page	
82489.27817	05/08/2020	6	A	1	620.00	0.25	139.50	ARCH
							telephone conference with John Golaszewski re: moving forward cooperatively vs. Sciamme	
82489.27817	05/20/2020	44	A	4	360.00	0.30	97.20	ARCH
							Review/analyze letter correspondence and stipulation vacating default which was filed with the SDNY Clerk and sent to Judge Woods for his signature.	
82489.27817	05/20/2020	48	A	1	465.00	0.40	167.40	ARCH
							Received and reviewed stipulation vacating Clerk's Certificate of Default and conference with DC regarding same; review of rules for initial disclosure in federal courts; received and reviewed emails between counsel regarding stipulation and next steps	
82489.27817	05/20/2020	6	A	1	620.00	0.25	139.50	ARCH
							receipt and review of proposed stip opening default; preparation of correspondence Yuanda atty. re: good faith, flow down provision of subcontract, execute stip.	
82489.27817	05/21/2020	48	A	1	465.00	0.30	125.55	ARCH
							Conference with DC regarding initial disclosures; review of Court Rule and email to client regarding initial disclosures	
82489.27817	05/21/2020	48	A	1	465.00	0.20	83.70	ARCH
							Received and reviewed Court Orders regarding Initial Conference and vacating of Clerk's default	
82489.27817	05/21/2020	6	A	1	620.00	0.10	55.80	ARCH
							receipt and review of Yuanda atty. letter to Court re: stip. w/d default, Yuanda's time to respond	
82489.27817	05/22/2020	48	A	1	465.00	0.10	41.85	ARCH
							Emails regarding vacating of Clerk's Certificate of Default	
82489.27817	05/22/2020	6	A	1	620.00	0.25	139.50	ARCH
							preparation of correspondence Steven re: status of default	
82489.27817	05/26/2020	6	A	1	620.00	0.20	111.60	ARCH
							receipt and review of e-mail exchange Steven, Mike Porcelli at Sciamme re: WT-3 Clerestory Remediation/Notice to Perform under protest, Phil C's e-mail re: timeline	
82489.27817	05/27/2020	44	A	4	360.00	0.30	97.20	ARCH
							Review/analyze email corr. with Yuanda and their counsel regarding negotiations surrounding Yuanda's cooperation.	
82489.27817	05/27/2020	6	A	1	620.00	0.66	368.28	ARCH
							preparation of correspondence Yuanda atty. forwarding Steven's warranty inquiry to Yuanda; receipt and review of Yuanda atty. response; preparation of correspondence Steven re: same;	

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 5

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>	
Client ID 82489.27817 Whitestone Construction, Corp.									
82489.27817	05/28/2020	44	A	5	360.00	0.30	97.20	telephone conference with Steven re: same, timeliness of Yuanda's response Communicate (in firm) : Atty conference with Michael McDermott regarding disclosure demanded by the Court, conference requirements, and key issues for the federal action.	ARCH
82489.27817	05/28/2020	44	A	4	360.00	1.10	356.40	Review/analyze court docket, signed Orders from Judge Woods concerning conferences to be held, the Court's requirements for discovery, the Judge's preferred disclosure schedule, and the Judge's rules concerning operation of the court during the COVID-19 health crisis.	ARCH
82489.27817	06/05/2020	6	A	1	620.00	0.10	55.80	receipt and review of e-mail exchange between Steven/Tan 5/27; telephone conference with Steven re: same	ARCH
82489.27817	06/22/2020	44	A	6	360.00	0.30	97.20	Communicate (with client) : Phone call with James Dearth discussing calculation of damages and documents needed for production of initial disclosure.	ARCH
82489.27817	06/22/2020	44	A	4	360.00	0.70	226.80	Review/analyze FRCP 26 Initial Disclosure requirements, review case management order stating deadlines and requirements for initial disclosure; review client documents in order to compile necessary items for disclosure.	ARCH
82489.27817	06/22/2020	44	A	3	360.00	3.60	1,166.40	Review Judge Woods' Rules of Court, conference requirements, discovery requirements, and standards for submitting a Joint Status letter and Case Management Plan ahead of the July 6th conference; draft proposed joint status letter; draft proposed case management plan; review prior corr. with Yuanda's counsel re: settlement; draft email to Yuanda's counsel regarding discovery requirements and Court conference.	ARCH
82489.27817	06/23/2020	44	A	8	360.00	0.30	97.20	Communicate (other external) : Email corr. with John Golaszewski, counsel for Yuanda, regarding the Court's required Joint Status letter and Case Management Plan; revising and finalizing proposed documents to send to counsel.	ARCH
82489.27817	06/23/2020	6	A	1	620.00	0.20	111.60	receipt and review of case management plan; inter-office conference with Chris re: same	ARCH
82489.27817	06/24/2020	44	A	3	360.00	2.10	680.40	Review/analyze Fdocuments provided by clients for computation of damages, evidence supporting claim, and information required by statute; in furtherance of producing same in response to initial disclosure requirements and other discovery.	ARCH
82489.27817	06/25/2020	44	A	6	360.00	0.50	162.00	Communicate (with client) : Phone call with James Dearth regarding computation of claim and location of documents.	ARCH
82489.27817	06/25/2020	44	A	8	360.00	0.20	64.80	Communicate (other external) : Email corr. with counsel for Yuanda regarding comments on joint status letter and case management plan which need to be sent to the Court.	ARCH
82489.27817	06/25/2020	44	A	3	360.00	3.40	1,101.60	Draft/revise Whitestone's Initial Disclosure; reviewing Whitestone's insurance policies and contract with Yuanda for insurance requirements; review Whitestone v. Sciamme documents related to WT-3 clerestory dispute in order to identify documents relevant to Yuanda dispute.	ARCH
82489.27817	06/25/2020	6	A	1	620.00	0.10	55.80	receipt and review of discovery plan for submittal to court	ARCH
82489.27817	06/26/2020	44	A	4	360.00	1.70	550.80	Review/analyze revisions to Joint Status Letter from Yuanda; revise to reflect present status of the action; and prepare settlement demand to Yuanda.	ARCH
82489.27817	06/26/2020	44	A	5	360.00	0.30	97.20	Communicate (in firm) : Phone call with Donald	ARCH

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 6

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Client ID 82489.27817 Whitestone Construction, Corp.								
82489.27817	06/26/2020	44	A	6	360.00	0.30	97.20	Carbone regarding joint status letter revisions, initial disclosure, settlement discussions with Yuanda, and next steps towards prosecution of the action as we approach the Case Management Conference. Communicate (with client) : Phone call with James Dearth regarding status of WT-3 clerestory remediation work. ARCH
82489.27817	06/26/2020	44	A	8	360.00	0.40	129.60	Communicate (other external) : Email corr. with counsel for Yuanda, revising same per the discussions had with Donald Carbone. ARCH
82489.27817	06/26/2020	44	A	4	360.00	0.60	194.40	Review/analyze Yuanda's Answer, Rule 7.1 Statement, and Rule 26 Initial Disclosure, reviewing admissions, denials and defenses. ARCH
82489.27817	06/26/2020	6	A	1	620.00	0.20	111.60	inter-office conference with Chris re: status discovery schedule, joint letter to court; receipt and review of joint letter to court ARCH
82489.27817	06/29/2020	44	A	3	360.00	1.20	388.80	Revise and finalize Joint Status Letter and Case Management Plan pursuant to conversations had with counsel for Yuanda and call with Donald Carbone; file with SDNY through e-filing system; and email corr. with Judge Woods pursuant to the Judge's civil action rules. ARCH
82489.27817	07/06/2020	44	A	4	360.00	0.40	129.60	Review/analyze Court notices, Judge's Rules, and party submissions in preparation for conference with Judge Woods to set a discovery schedule in place. ARCH
82489.27817	07/06/2020	44	A	8	360.00	1.20	388.80	Communicate (other external) : Conf. call with Judge Woods and counsel for Yuanda, negotiating merits of the case, damages, discovery needed, litigation strategy, and avenues for settlement, prepare summary of proceedings for client file. ARCH
82489.27817	07/07/2020	44	A	5	360.00	0.20	64.80	Communicate (in firm) : Attorney conference with Donald Carbone discussing outcome of case management conference, potential for bringing motion for summary judgment. ARCH
82489.27817	07/07/2020	6	A	1	620.00	0.10	55.80	inter-office conference with Chris re: conf. call with Judge Woods ARCH
82489.27817	07/10/2020	44	A	4	360.00	0.40	129.60	Review/analyze the Court's signed Case Management Order and take note of all salient deadlines surrounding discovery and next mandatory appearances. ARCH
82489.27817	07/10/2020	44	A	8	360.00	0.10	32.40	Communicate (other external) : Email corr. with John Golaszewski, counsel for Yuanda, regarding status of Yuanda's response to settlement. ARCH
82489.27817	07/14/2020	44	A	8	360.00	0.30	97.20	Communicate (other external) : Phone call with John Golaszewski, counsel for Yuanda, regarding settlement discussions. ARCH
82489.27817	07/15/2020	44	A	4	360.00	0.30	97.20	Review/analyze WCC contract with Yuanda to assess whether, in default, Yuanda is liable for labor costs associated with the remediation of the project. ARCH
82489.27817	07/15/2020	44	A	6	360.00	0.40	129.60	Communicate (with client) : Phone call with James Dearth regarding status of Yuanda remedial work and progress made by WCC vs. what benefit would be derived from Yuanda's involvement in the process. ARCH
82489.27817	07/15/2020	6	A	1	620.00	0.40	223.20	telephone conference with Yuanda atty. re: settlement conf.; telephone conference with Steven re: same; preparation of correspondence Yuanda atty. re: same; receipt and review of Yuanda atty. e-mail re: revised time for conf. call; preparation of correspondence Steven re: same ARCH
82489.27817	07/23/2020	44	A	8	360.00	0.30	97.20	Communicate (other external) : Email corr. with counsel for Yuanda; call with James Dearth, regarding settlement conference. ARCH
82489.27817	07/23/2020	44	A	4	360.00	1.60	518.40	Review/analyze Whitestone back-up for damages in ARCH



Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 7

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>								
82489.27817	07/23/2020	44	A	8	360.00	0.60	194.40	ARCH
							preparation for settlement conference with Yuanda. Communicate (other external) : Settlement conference with DJC, WCC, Yuanda, and Yuanda's in-house and outside counsel.	
82489.27817	07/23/2020	6	A	1	620.00	0.50	279.00	ARCH
							conf. call Yuanda, Tan and its attorneys, DJC, Chris, Steven, et al. - explained Yuanda needed to pony up \$500k reserve rights	
82489.27817	07/27/2020	6	A	1	620.00	0.20	111.60	ARCH
							telephone conference with Yuanda Chicago counsel re: substitution of counsel	
82489.27817	07/28/2020	6	A	1	620.00	0.33	184.14	ARCH
							receipt and review of Stevens' e-mail re: Yuanda status; preparation of correspondence responding regarding telephone conference with Adam Gill yesterday; receipt and review of Steven's response plain English; preparation of correspondence responding	
82489.27817	07/29/2020	44	A	3	360.00	5.30	1,717.20	ARCH
							Draft/revise Whitestone's First Document Demands on Yuanda and First Set of Interrogatories, reviewing Federal Rules, Local Rules of the SDNY which modify same, and the specific discovery Rules mandated by Judge Woods; review pleadings and relevant client documents.	
82489.27817	07/29/2020	44	A	3	360.00	0.50	162.00	ARCH
							Confer with D. Carbone regarding revisions to Document Demands and Interrogatories; Revise same pursuant to comments/revisions provided by Donald; Email corr. with counsel for Yuanda serving said demands.	
82489.27817	07/29/2020	6	A	1	620.00	0.25	139.50	ARCH
							receipt and review of WS doc. demands; inter-office conference with Chris re: minor changes	
82489.27817	07/29/2020	44	A	4	360.00	0.50	162.00	ARCH
							Review/analyze Yuanda's Interrogatories and Document Demands, assessing scope of discovery being requested, whether same is proper in light of Rules of Court, and potential avenues for response.	
82489.27817	07/30/2020	44	A	3	360.00	1.40	453.60	ARCH
							Draft/revise letter rejecting Yuanda's interrogatories as they are improper, fail to meet the requirements of the SDNY Local Rules and are improper at this stage of the litigation; cross-referencing with Local Rules of Court, Judge's Rules, Federal Rules of Procedure, and the Case Management Order in effect.	
82489.27817	07/30/2020	6	A	1	620.00	0.20	111.60	ARCH
							receipt and review of letter rejecting Yuanda's interrogatories; inter-office conference with Chris re: same	
82489.27817	08/10/2020	44	A	4	360.00	0.30	97.20	ARCH
							Review/analyze Yuanda settlement letter and claim analysis; review discovery demands asserted by Yuanda.	
82489.27817	08/10/2020	6	A	1	620.00	0.25	139.50	ARCH
							receipt and review of Adam Gil e-mail re: alleged non-communication; preparation of correspondence responding	
82489.27817	08/12/2020	44	A	4	360.00	0.60	194.40	ARCH
							Review/analyze correspondence from counsel to Yuanda setting forth its purported defense to Whitestone's contract claim; Review Whitestone WT-3 letters and correspondence with Sciamme reserving its rights to dispute while working under protest; Call with Donald Carbone to discuss next steps in suit and viability of summary judgment motion.	
82489.27817	08/13/2020	44	A	4	360.00	1.10	356.40	ARCH
							Review/analyze Yuanda Contract, NOD and DOD for WT-3 Clerestory work, prior correspondence between Whitestone and Sciamme regarding WT-3 Clerestory work, notices between Whitestone and Yuanda concerning WT-3 Clerestory work and rejection thereof; cross-reference all document with Yuanda Contract and Position Statement.	
82489.27817	08/13/2020	44	A	4	360.00	0.50	162.00	ARCH
							Review/analyze all Whitestone correspondence with	

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 8

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>								
							Yuanda to ensure that all contractual obligations with respect to non-conforming work have been met, in furtherance of seeking summary disposition in Whitestone's favor.	
82489.27817	08/17/2020	44	A	5	360.00	0.10	32.40 Communicate (in firm) : Atty. conf. with D. Carbone regarding next steps in the action, viability of summary judgment, and discovery.	ARCH
82489.27817	08/17/2020	7	A	1	620.00	1.00	558.00 File review; prepare for strategy conference with D. Carbone.	ARCH
82489.27817	08/17/2020	7	A	1	620.00	0.30	167.40 Teleconference with D. Carbone regarding possible summary judgment motion; other case issues.	ARCH
82489.27817	08/17/2020	6	A	1	620.00	0.50	279.00 inter-office conference with GK re: possible motion for SJ	ARCH
82489.27817	08/18/2020	44	A	8	360.00	0.20	64.80 Communicate (other external) : Phone call and Email corr. with Adam Gill, counsel to Yuanda regarding discovery and exchange of electronically stored information.	ARCH
82489.27817	08/19/2020	44	A	4	360.00	0.20	64.80 Review/analyze Court notice regarding motion for admission of Yuanda's counsel pro hac vice.	ARCH
82489.27817	08/19/2020	44	A	5	360.00	0.20	64.80 Communicate (in firm) : Atty conf. with Gary Kushner regarding viability of motion for summary judgment on the contract and potential contractual interpretation issues.	ARCH
82489.27817	08/19/2020	7	A	1	620.00	0.10	55.80 Teleconference with C. Rodriguez regarding factual issue in case; discuss prospect of successful summary judgment motion.	ARCH
82489.27817	08/20/2020	44	A	4	360.00	0.30	97.20 Review/analyze proposed letter motion and revised discovery scheduling order from Yuanda; cross-reference with discovery scheduling order set in place by the Court and assess basis for Yuanda's request.	ARCH
82489.27817	08/21/2020	7	A	1	620.00	0.20	111.60 Teleconference with C. Rodriguez regarding discovery issues.	ARCH
82489.27817	08/24/2020	44	A	3	360.00	0.60	194.40 Review and revise Yuanda's proposed letter to the Court regarding discovery and proposed revised discovery order.	ARCH
82489.27817	08/24/2020	44	A	3	360.00	4.50	1,458.00 Draft/revise responses to interrogatories and discovery demands, cross-referencing with client documents and communications, pleadings, and relevant correspondence/notices; review and compile responsive documents.	ARCH
82489.27817	08/24/2020	7	A	1	620.00	0.10	55.80 Email exchange with Adam Gill regarding rejection of settlement offer.	ARCH
82489.27817	08/25/2020	44	A	8	360.00	0.20	64.80 Communicate (other external) : Email corr. with counsel for Yuanda regarding ESI stipulation and discovery protocol.	ARCH
82489.27817	08/25/2020	44	A	3	360.00	2.60	842.40 Draft/revise Whitestone responses to Yuanda's discovery demands, cross-referencing with pleadings and client documents from related Sciame action.	ARCH
82489.27817	08/25/2020	6	A	1	620.00	1.75	976.50 review of PO/contract between WS/Yuanda	ARCH
82489.27817	08/25/2020	7	A	1	620.00	0.20	111.60 Conference with D. Carbone regarding strategy for case prosecution/motion for summary judgment.	ARCH
82489.27817	08/26/2020	44	A	5	360.00	0.20	64.80 Communicate (in firm) : Atty conf. with Gary Kushner assessing revisions to discovery letter and discovery schedule.	ARCH
82489.27817	08/26/2020	44	A	3	360.00	2.50	810.00 Revise Whitestone responses to Yuanda's discovery demands.	ARCH
82489.27817	08/26/2020	44	A	3	360.00	0.30	97.20 Revise joint letter requesting extension of discovery schedule pursuant to comments provided by Gary M. Kushner; Email corr. with Adam Gill regarding revisions to discovery schedule and letter application.	ARCH
82489.27817	08/26/2020	7	A	1	620.00	0.20	111.60 Teleconference with C. Rodriguez regarding	ARCH

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 9

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	08/26/2020	7	A	1	620.00	0.20	111.60	following up on discovery issues. Review letter to court regarding joint application to extend discovery deadlines.	ARCH
82489.27817	08/27/2020	7	A	1	620.00	0.10	55.80	Review discovery order.	ARCH
82489.27817	08/27/2020	7	A	1	620.00	0.20	111.60	Teleconference with Adam Gill regarding discovery issues/deadlines.	ARCH
82489.27817	08/28/2020	44	A	5	360.00	0.30	97.20	Communicate (in firm) : Atty conf. with Gary Kushner to address revisions to discovery letter motion, ESI stipulation, discovery vendor, and next steps with the litigation.	ARCH
82489.27817	08/28/2020	7	A	1	620.00	1.00	558.00	Review, edit responses to discovery requests.	ARCH
82489.27817	08/28/2020	7	A	1	620.00	0.20	111.60	Teleconference with C. Rodriguez regarding follow up with discovery issues/service and ESI issues.	ARCH
82489.27817	08/31/2020	44	A	3	360.00	0.70	226.80	Revise Whitestone responses to Yuanda discovery demands and interrogatories; Email corr. with Steven Grzic and James Dearth regarding discovery responses; finalize responses to Yuanda discovery and email corr. with Yuanda's counsel serving responses.	ARCH
82489.27817	08/31/2020	7	A	1	620.00	0.10	55.80	Emails with C. Rodriguez regarding production of discovery responses to Adam Gill.	ARCH
82489.27817	09/01/2020	44	A	4	360.00	0.60	194.40	Review/analyze court notice scheduling conference to address discovery; Email corr. with counsel for Yuanda regarding logistics for the call; Review Judge Woods's rules regarding conferences; EMail corr. with D. Carbone and G. Kushner regarding conference.	ARCH
82489.27817	09/01/2020	7	A	1	620.00	0.10	55.80	Review, complete standard appearance form required by court for teleconference.	ARCH
82489.27817	09/01/2020	7	A	1	620.00	0.10	55.80	Review Judge Woods rules/emerging Covid-19 Rules.	ARCH
82489.27817	09/02/2020	44	A	5	360.00	0.30	97.20	Communicate (in firm): Atty conf. with G. Kushner regarding preparations for the discovery conf.; Atty conf. with D. Carbone regarding issues surrounding Yuanda performance bond.	ARCH
82489.27817	09/02/2020	7	A	1	620.00	2.50	1,395.00	Prepare for strategy conference with D. Carbone; extensive file and document review.	ARCH
82489.27817	09/02/2020	7	A	1	620.00	1.00	558.00	Conference with D. Carbone to discuss merits of summary judgment motion.	ARCH
82489.27817	09/02/2020	6	A	1	620.00	1.00	558.00	inter-office conference with GK re: key clauses in PO/Contract, strategy-motion for SJ	ARCH
82489.27817	09/03/2020	16	A	1	480.00	0.50	216.00	TC with GMK re research for Local Rule 56.1 letter in advance of filing motion for summary judgment.	ARCH
82489.27817	09/03/2020	44	A	3	360.00	1.20	388.80	Draft ESI Search Term and Custodian stipulation, reviewing client documents to identify relevant terms and custodians.	ARCH
82489.27817	09/03/2020	44	A	6	360.00	0.30	97.20	Communicate (with client) : Email corr. with Phil Carvelas, Steven Grzic, and James Dearth regarding Yuanda Performance Bond, review Change Order which provides a credit in exchange for a waiver of performance bond.	ARCH
82489.27817	09/03/2020	44	A	5	360.00	0.20	64.80	Communicate (in firm) : Atty. conf. with Gary Kushner regarding discovery conference with Court and Adam Gill, counsel for Yuanda, addressing issues concerning discovery and ESI.	ARCH
82489.27817	09/03/2020	7	A	1	620.00	0.30	167.40	Prepare for teleconference with the court regarding discovery extension.	ARCH
82489.27817	09/03/2020	7	A	1	620.00	0.60	334.80	Teleconference with court regarding discovery extension request.	ARCH
82489.27817	09/03/2020	7	A	1	620.00	0.20	111.60	Follow up with A. Gill regarding discovery issues.	ARCH
82489.27817	09/03/2020	6	A	1	620.00	0.20	111.60	inter-office conference with Gary re: conf. with Judge, discovery; E-disclosure, SJ motions	ARCH
82489.27817	09/09/2020	44	A	4	360.00	1.60	518.40	Review/analyze discovery produced by Yuanda.	ARCH
82489.27817	09/10/2020	16	A	1	480.00	3.00	1,296.00	Analyze complaint and client contract with Yuanda.	ARCH

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 10

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #	
Client ID 82489.27817 Whitestone Construction, Corp.									
							Research authority re no need to interpret contract if its provisions are unambiguous. Research authority re no judicial estoppel when asserted positions are not incompatible. Draft email memorandum to GMK re same.		
82489.27817	09/11/2020	7	A	1	620.00	0.20	111.60	Email to A. Gill with request for consent for pre-motion conference on motion for summary judgment.	ARCH
82489.27817	09/11/2020	7	A	1	620.00	0.20	111.60	Review chamber's rules for authority to file motion for summary judgment.	ARCH
82489.27817	09/11/2020	7	A	1	620.00	1.00	558.00	Draft letter to Court regarding request for pre-motion conference.	ARCH
82489.27817	09/14/2020	7	A	1	620.00	0.10	55.80	Email to A. Gill regarding consent to file summary judgment motion.	ARCH
82489.27817	09/14/2020	7	A	1	620.00	0.50	279.00	Continue work on letter to Judge Woods.	ARCH
82489.27817	09/15/2020	6	A	1	620.00	0.20	111.60	inter-office conference with Gary K. re: w/d certain c/a cross-motions for SJ	ARCH
82489.27817	09/16/2020	7	A	1	620.00	0.10	55.80	Receipt and review of email from A. Gill regarding pre-motion continuance request.	ARCH
82489.27817	09/16/2020	7	A	1	620.00	0.20	111.60	Email to A. Gill regarding response to Gill email regarding motion.	ARCH
82489.27817	09/17/2020	44	A	4	360.00	1.30	421.20	Review/analyze letter from Yuanda requesting pre-motion conference, setting forth alleged position on contract; back and forth email corr. with counsel to Yuanda and Court Clerk regarding conference scheduled for 11:00 a.m.; drafter and file letter correspondence with Court regarding adjournment request, reviewing Judge's Rules.	ARCH
82489.27817	09/17/2020	44	A	4	360.00	0.60	194.40	Review/analyze discovery requirements as modified by the most recent conference call; email corr. with client advising on documents needed for production.	ARCH
82489.27817	09/17/2020	16	A	1	480.00	2.90	1,252.80	Analyze client's complaint and June 2019 letter re defective work. Analyze Yuanda's letter to Court requesting permission to make motion to dismiss. Research liberal pleading standard under federal rule of civil procedure 12(c). Draft and revise letter responding to Yuanda's request for dismissal motion. TC with GMK re same.	ARCH
82489.27817	09/17/2020	7	A	1	620.00	0.20	111.60	Conference with Scott Simon to discuss letter opposition to request for authority to file 12(c) motion.	ARCH
82489.27817	09/17/2020	7	A	1	620.00	2.00	1,116.00	Prepare, edit and finalize multiple drafts of letter opposition to Yuanda's application for permission to file Rule 12(c) motion.	ARCH
82489.27817	09/17/2020	7	A	1	620.00	0.20	111.60	Review letter filed by Yuanda seeking preliminary conference on application to file a Rule 12(c) motion.	ARCH
82489.27817	09/17/2020	7	A	1	620.00	0.10	55.80	Email from A. Gill regarding outstanding discovery.	ARCH
82489.27817	09/17/2020	7	A	1	620.00	0.20	111.60	Emails with C. Rodriguez regarding outstanding discovery; court conference on preliminary conference request.	ARCH
82489.27817	09/17/2020	7	A	1	620.00	0.10	55.80	Prepare and file notice of appearance; file with court.	ARCH
82489.27817	09/17/2020	7	A	1	620.00	0.20	111.60	Email with A. Gill regarding discovery issues.	ARCH
82489.27817	09/18/2020	44	A	3	360.00	0.30	97.20	Draft/revise appearance schedule sheet pursuant to Judge Woods' Court Rules, cross-referencing with requirements of Judge Woods' Rules; email corr. with the Court submitting the appearance sheet ahead of the 9/18 pre-motion conference.	ARCH
82489.27817	09/18/2020	44	A	4	360.00	0.30	97.20	Review/analyze deadlines imposed by the Court for Yuanda to brief its motion for dispositive relief.	ARCH
82489.27817	09/18/2020	7	A	1	620.00	0.10	55.80	Email exchange with C. Rodriguez regarding follow up with document production.	ARCH
82489.27817	09/18/2020	7	A	1	620.00	0.20	111.60	Teleconference with D. Carbone regarding authority	ARCH

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 11

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>								
							to voluntarily dismiss remaining non-breach of contract claims in complaint.	
82489.27817	09/18/2020	7	A	1	620.00	0.50	279.00 Prepare for teleconference/hearing with court and A. Gill regarding request to file 12(c) motion.	ARCH
82489.27817	09/18/2020	7	A	1	620.00	0.60	334.80 Teleconference/hearing with court and A. Gill regarding Rule 12(c) application.	ARCH
82489.27817	09/19/2020	7	A	1	620.00	0.10	55.80 Receipt and review of court's entry/order scheduling 12(c) motion.	ARCH
82489.27817	09/21/2020	44	A	5	360.00	0.20	64.80 Communicate (in firm) : Atty conf. w. Gary Kushner regarding discovery issues.	ARCH
82489.27817	09/21/2020	7	A	1	620.00	0.50	279.00 Continue to work on letter application for authority to bring rule 56 motion.	ARCH
82489.27817	09/21/2020	7	A	1	620.00	0.20	111.60 Teleconference with C. Rodriguez to dismiss outstanding discovery response status.	ARCH
82489.27817	09/21/2020	7	A	1	620.00	0.20	111.60 Teleconference with S. Simon to assign research project for opposition to Rule 12(c) motion.	ARCH
82489.27817	09/22/2020	7	A	1	620.00	0.10	55.80 Email with D. Carbone regarding status update on court's ruling on 9/8 conference.	ARCH
82489.27817	09/22/2020	7	A	1	620.00	0.20	111.60 Teleconference with D. Carbone regarding next steps in litigation; Rule 56 motion status.	ARCH
82489.27817	09/22/2020	7	A	1	620.00	0.20	111.60 Email exchange with A. Gill regarding preparation of stip withdrawing claims.	ARCH
82489.27817	09/23/2020	7	A	1	620.00	0.50	279.00 Finalize draft of Rule 56 motion letter application.	ARCH
82489.27817	09/23/2020	6	A	1	620.00	0.10	55.80 receipt and review of Chris R. 9/17 e-mail James Dearth re: discovery docs. for production	ARCH
82489.27817	09/23/2020	7	A	1	620.00	1.00	558.00 Continue work on Rule 56 motion.	ARCH
82489.27817	09/23/2020	7	A	1	620.00	0.20	111.60 Teleconference and email with C. Rodriguez regarding amount of damages claimed by client.	ARCH
82489.27817	09/23/2020	7	A	1	620.00	0.20	111.60 Receipt and review of stipulation dismissing claims in complaint.	ARCH
82489.27817	09/24/2020	7	A	1	620.00	1.00	558.00 Continue edits on Rule 56 motion.	ARCH
82489.27817	09/25/2020	16	A	1	480.00	1.00	432.00 Revisions to Rule 56 letter to Judge Wood. Corr. and TC with GMK re same. File same.	ARCH
82489.27817	09/25/2020	7	A	1	620.00	0.60	334.80 Final revisions to Rule 56 letter application.	ARCH
82489.27817	09/25/2020	7	A	1	620.00	0.40	223.20 Receipt and review of Rule 12(c) motion to dismiss from Yuanda.	ARCH
82489.27817	09/25/2020	7	A	1	620.00	0.50	279.00 Prepare outline for opposition to Rule 12(c) motion.	ARCH
82489.27817	09/25/2020	7	A	1	620.00	1.00	558.00 Final edits to Rule 56 application.	ARCH
82489.27817	09/28/2020	7	A	1	620.00	0.60	334.80 Review 12(c) motion; develop parts to approve.	ARCH
82489.27817	09/28/2020	7	A	1	620.00	0.10	55.80 Email to C. Rodriguez regarding discovery update.	ARCH
82489.27817	09/29/2020	16	A	1	480.00	4.40	1,900.80 Analyze Yuanda's FRCP 12(c) motion. Corr. and TC with GMK re same. Draft Judge Woods telephone conference appearance report. Corr. with opposing counsel re same. Research authority re judicial estoppel in connection with FRCP 12(c) motion to dismiss. Begin drafting outline for response to motion.	ARCH
82489.27817	09/29/2020	7	A	1	620.00	0.30	167.40 Receipt and review of letter from A. Gill in response to Whitestone letter application for authority to file Rule 56 motion.	ARCH
82489.27817	09/29/2020	7	A	1	620.00	0.10	55.80 Receipt and review of court of approval to schedule preliminary conference on Whitestone's request for motion for summary judgment.	ARCH
82489.27817	09/29/2020	7	A	1	620.00	0.10	55.80 Conference with S. Simon to discuss arrangements for 9/30 conference.	ARCH
82489.27817	09/29/2020	7	A	1	620.00	0.20	111.60 Teleconference with S. Simon to discuss strategy in responding to Rule 12(c) motion.	ARCH
82489.27817	09/29/2020	7	A	1	620.00	0.10	55.80 Receipt and review of SDNY filing from Yuanda regarding judicial notice of Sciamé/Litigation complaint.	ARCH
82489.27817	09/29/2020	7	A	1	620.00	0.20	111.60 Email to C. Rodriguez regarding follow up to discovery dispute.	ARCH
82489.27817	09/30/2020	16	A	1	480.00	4.90	2,116.80 Research authority re proper response to granting FRCP 12(c) motion is to allow plaintiff to replead.	ARCH

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 12

	Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
Client ID 82489.27817 Whitestone Construction, Corp.										
									Draft memorandum of law in opposition to Yuanda's motion.	
82489.27817	09/30/2020	44	A		4	360.00	2.90	939.60	Review/analyze and produce Whitestone's first document production.	ARCH
82489.27817	09/30/2020	7	A		1	620.00	1.00	558.00	Prepare for oral argument of Whitestone's letter application for authority to file Rule 56 motion.	ARCH
82489.27817	09/30/2020	7	A		1	620.00	0.20	111.60	Email to C. Rodriguez regarding status update on discovery compliance.	ARCH
82489.27817	09/30/2020	7	A		1	620.00	0.80	446.40	Participation in teleconference hearing with J. Woods and A. Gill regarding Rule 56 motion.	ARCH
82489.27817	09/30/2020	7	A		1	620.00		0.00	Receipt and review of second notice of deposition from Gill.	ARCH
82489.27817	10/01/2020	44	A		6	360.00	0.40	129.60	Communicate (with client) : Phone calls and email corr. with James Dearth regarding outstanding discovery.	ARCH
82489.27817	10/01/2020	7	A		1	620.00	0.20	111.60	Conference with C. Rodriguez regarding follow up on discovery obligations.	ARCH
82489.27817	10/01/2020	7	A		1	620.00	1.00	558.00	Revise draft of Whitestone's opposition to Rule 12(c) motion; edit.	ARCH
82489.27817	10/01/2020	7	A		1	620.00	0.10	55.80	Receipt and review of email from S. Dist. Ct. regarding scheduling on motion for summary judgment.	ARCH
82489.27817	10/01/2020	7	A		1	620.00	1.00	558.00	Review draft of opposition to Rule 12(c) motion to dismiss.	ARCH
82489.27817	10/01/2020	7	A		1	620.00	0.10	55.80	Email to S. Simon regarding comments to draft of opposition to Rule 12(c) motion.	ARCH
82489.27817	10/01/2020	7	A		1	620.00	0.10	55.80	Interoffice conference with C. Rodriguez regarding status updates on compliance with discovery; document production.	ARCH
82489.27817	10/05/2020	44	A		6	360.00	0.30	97.20	Communicate (with client) : Email corr. with James Dearth regarding Yuanda discovery documents; Review documents identified by James Dearth for production.	ARCH
82489.27817	10/06/2020	16	A		1	480.00	1.10	475.20	TC with GMK re further strategy for objecting to Yuanda's motion to dismiss under FRCP 12(c).	ARCH
82489.27817	10/06/2020	7	A		1	620.00	0.10	55.80	Teleconference with D. Carbone regarding client instruction to proceed with summary judgment motion.	ARCH
82489.27817	10/06/2020	7	A		1	620.00	1.00	558.00	Teleconference with S. Simon to discuss modification to opposition brief/Yuanda's motion to dismiss.	ARCH
82489.27817	10/06/2020	7	A		1	620.00	1.00	558.00	Research additional legal issues regarding opposition to Yuanda's motion to dismiss.	ARCH
82489.27817	10/06/2020	6	A		1	620.00	0.20	111.60	inter-office conference with GK/CR re: Yuanda costs approx. \$125-140k; inter-office conference with GK cont. to move for SJ	ARCH
82489.27817	10/07/2020	16	A		1	480.00	5.00	2,160.00	Research authority re failure to satisfy condition precedent as affirmative defense. Research adequacy of pleading under FRCP 8(a). Research choice of law requirements under diversity jurisdiction. Revisions to opposition to motion to dismiss. Analyze docket for filing of Sciamé-Whitestone contract. TC and corr. with GMK re same.	ARCH
82489.27817	10/07/2020	7	A		1	620.00	1.00	558.00	Extensive review, revisions to second draft of opposition to Rule 12(c) motion to dismiss.	ARCH
82489.27817	10/07/2020	7	A		1	620.00	0.40	223.20	Review research on Rule 8(a) pleading requirements relating to condition precedent.	ARCH
82489.27817	10/07/2020	7	A		1	620.00	0.20	111.60	Email and teleconferences with S. Simon regarding assignment of research project relating to Rule 8(a).	ARCH
82489.27817	10/08/2020	16	A		1	480.00	2.00	864.00	Revisions to opposition to Yuanda's motion to dismiss. TC with GMK re same.	ARCH
82489.27817	10/08/2020	44	A		6	360.00	0.20	64.80	Communicate (with client) : Email corr. with James Dearth re: CAD file discovery issues.	ARCH



Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 13

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	10/08/2020	44	A	8	360.00	0.30	97.20	Communicate (other external) : Email corr. with Yuanda's counsel re: discovery issues, further production, and translation requirements.	ARCH
82489.27817	10/08/2020	44	A	29	360.00	0.40	129.60	Research burden of foreign language translation in discovery; review Yuanda discovery, identifying Chinese language documents.	ARCH
82489.27817	10/08/2020	44	A	4	360.00	0.40	129.60	Review/analyze documents in preparation for appeal, phone call with appellate vendor to ensure that record is being compiled.	ARCH
82489.27817	10/08/2020	44	A	4	360.00	1.40	453.60	Review/analyze discovery produced as it relates to Yuanda's second discovery demand.	ARCH
82489.27817	10/08/2020	44	A	4	360.00	0.90	291.60	Review/analyze Whitestone's second document production for privilege and responsiveness to Yuanda demands.	ARCH
82489.27817	10/08/2020	44	A	3	360.00	1.10	356.40	Draft/revise response to Yuanda's second set of discovery demands.	ARCH
82489.27817	10/08/2020	7	A	1	620.00	1.00	558.00	Review, edit 4th draft of opposition to Rule 12(c) motion to dismiss.	ARCH
82489.27817	10/08/2020	6	A	1	620.00	0.10	55.80	inter-office conference with Chris; receipt and review of e-mail James Dearth re: doc. production	ARCH
82489.27817	10/08/2020	7	A	1	620.00	0.10	55.80	Receipt and review of email from Yuanda's counsel regarding discovery deficiency; meet and confer.	ARCH
82489.27817	10/08/2020	7	A	1	620.00	0.20	111.60	Email exchange with C. Rodriguez regarding discovery and document production issues.	ARCH
82489.27817	10/09/2020	16	A	1	480.00	0.60	259.20	Revisions to table of contents and table of authorities. Finalize and file opposition to motion to dismiss.	ARCH
82489.27817	10/09/2020	44	A	8	360.00	0.20	64.80	Communicate (other external) : Email corr. with counsel for Yuanda regarding impending supplemental production.	ARCH
82489.27817	10/09/2020	7	A	1	620.00	0.10	55.80	Email to Scott Simon regarding research on agency issue.	ARCH
82489.27817	10/12/2020	44	A	4	360.00	4.30	1,393.20	Review/analyze Whitestone document production and prepare for disclosure to all parties; reviewing all emails, writings, and other documents for privilege, confidentiality, and other protections which would preclude disclosure; Email corr. with all counsel producing documents pursuant to Federal Rules.	ARCH
82489.27817	10/13/2020	44	A	6	360.00	0.50	162.00	Communicate (with client) : Phone call with James Dearth to discuss discovery produced, additional discovery needed, metrics utilized for obtaining discovery, and additional searches which must be performed to obtain further discovery.	ARCH
82489.27817	10/13/2020	44	A	6	360.00	0.30	97.20	Communicate (with client) : Email corr. with James, Steven, and Phil regarding Whitestone email discovery, search criteria, and whether additional emails exist for production.	ARCH
82489.27817	10/14/2020	6	A	1	620.00	0.10	55.80	inter-office conference with CR re: e-mail re: WS search terms	ARCH
82489.27817	10/16/2020	16	A	1	480.00	1.00	432.00	Analyze scheduling order for MSJ deadline. Analyze Yuanda's reply brief on Rule 12(c) motion to dismiss. Conf. with GMK re same. Research authority re summary judgment standard when adversary has already made MSJ. Corr. with GMK re same.	ARCH
82489.27817	10/16/2020	7	A	1	620.00	0.50	279.00	Review Yuanda reply brief regarding Rule 12(c) motion to dismiss; discuss with S. Simon.	ARCH
82489.27817	10/16/2020	7	A	1	620.00	0.10	55.80	Review court's scheduling order on motion for summary judgment.	ARCH
82489.27817	10/19/2020	7	A	1	620.00	0.60	334.80	Review reply filed by Yuanda regarding Rule 12(c) motion.	ARCH
82489.27817	10/19/2020	7	A	1	620.00	0.10	55.80	Email from Yuanda's counsel regarding discovery issue; teleconference with DJC regarding same.	ARCH
82489.27817	10/20/2020	7	A	1	620.00	0.10	55.80	Email to Yuanda's counsel with updates on discovery requests and emails for production.	ARCH

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 14

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	10/20/2020	7	A	1	620.00	0.10	55.80	Multiple email exchanges with F. Dylewski regarding ESI protocol/search terms issue.	ARCH
82489.27817	10/21/2020	16	A	1	480.00	0.50	216.00	Research Judge Woods's rules and docket regarding disclosure of electronically searchable information and protocols. Corr. with GMK re same.	ARCH
82489.27817	10/21/2020	7	A	1	620.00	0.30	167.40	Email exchange with Yuanda's counsel regarding discovery issue/search protocol.	ARCH
82489.27817	10/21/2020	7	A	1	620.00	0.20	111.60	Email to client with request for ESI search parameters.	ARCH
82489.27817	10/26/2020	7	A	1	620.00	0.40	223.20	Email exchange with client to obtain approval on letter to Yuanda with search protocol.	ARCH
82489.27817	10/26/2020	7	A	1	620.00	0.30	167.40	Draft, edit and finalize letter to Yuanda regarding search protocol.	ARCH
82489.27817	10/27/2020	44	A	5	360.00	0.40	129.60	Communicate (in firm) : Call with D. Carbone and G. Kushner discussing factual background of Yuanda matter in support of forthcoming motion for summary judgment.	ARCH
82489.27817	10/27/2020	6	A	1	620.00	0.10	55.80	inter-office conference with GK re: search term parameters conducted by Whitestone	ARCH
82489.27817	10/27/2020	6	A	1	620.00	0.33	204.60	inter-office conference with GK re: facts for motion for SJ; inter-office conference with Chris re: same	ARCH
82489.27817	10/27/2020	7	A	1	620.00	0.20	111.60	Research new case filed by Yuanda in SDNY.	ARCH
82489.27817	10/27/2020	7	A	1	620.00	2.00	1,116.00	Prepare draft of Rule 56 Motion.	ARCH
82489.27817	10/27/2020	7	A	1	620.00	0.30	167.40	Interoffice conference with DJC and C. Rodriguez to discuss/plan response to ESI issue and to discuss factual presentation to support motion for summary judgment.	ARCH
82489.27817	10/28/2020	16	A	1	480.00	0.80	345.60	Corr. and conf. with GMK re research for client's motion for summary judgment.	ARCH
82489.27817	10/28/2020	7	A	1	620.00	2.00	1,116.00	Continue to draft MOL regarding summary judgment and research cases to support argument.	ARCH
82489.27817	10/28/2020	7	A	1	620.00	1.00	558.00	Conference with S. Simon to discuss legal arguments to raise in Rule 56 motion.	ARCH
82489.27817	10/28/2020	7	A	1	620.00	0.20	111.60	Multiple emails with J. Denuth regarding discovery-related follow up issues.	ARCH
82489.27817	10/29/2020	16	A	1	480.00	5.00	2,160.00	Edits to memorandum of law in support of client's motion for summary judgment. Research authority re interpretation of contract must give effect to all terms. Draft section of brief re same. Corr. with GMK re same.	ARCH
82489.27817	10/29/2020	52	A	2	360.00	0.20	64.80	Pacer-On Line Research regarding last scheduling order (as requested by GMK), obtain copy of same for GMK	ARCH
82489.27817	10/29/2020	7	A	1	620.00	0.20	111.60	Conference with DJC regarding discovery issues.	ARCH
82489.27817	10/29/2020	7	A	1	620.00	2.50	1,395.00	Continue work, edits on summary judgment motion.	ARCH
82489.27817	10/30/2020	7	A	1	620.00	2.50	1,395.00	Continue to edit MOL in support of motion for summary judgment.	ARCH
82489.27817	10/30/2020	7	A	1	620.00	2.50	1,395.00	Draft initial version of Grzic declaration in support of motion for summary judgment.	ARCH
82489.27817	10/30/2020	7	A	1	620.00	0.50	279.00	Multiple teleconferences with P. Carvelas to discuss factual issues to support Grzic declaration.	ARCH
82489.27817	11/02/2020	16	A	1	480.00	1.50	648.00	TC with GMK re strategy on motion #2 for summary judgment. Revisions to motion #2 MSJ brief.	ARCH
82489.27817	11/02/2020	7	A	1	620.00	3.00	1,674.00	Continue to draft, edit memorandum of law and declaration in support of motion #2./motion for summary judgement	ARCH
82489.27817	11/02/2020	7	A	1	620.00	1.00	558.00	Teleconference with P. Carvelas regarding background facts for supporting declaration re: motion #2/motion for summary judgement	ARCH
82489.27817	11/02/2020	6	A	1	620.00	2.25	1,255.50	receipt and review of file; refresh background facts, WCC e-mail transmitting WT-3 clerestory remediation notification, WCC 5/6/19 Dispute Notice to Sciamie; review of contract/purchase order re: arguments in support of motion for SJ	ARCH



Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 15

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	11/02/2020	7	A	1	620.00	0.10	55.80	E-mail exchange with C. Rodriguez re: discovery folders/production to Yuanda.	ARCH
82489.27817	11/03/2020	7	A	1	620.00	4.00	2,232.00	Continue work on MOL and supporting declaration re: motion #2/motion for summary judgement.	ARCH
82489.27817	11/04/2020	16	A	1	480.00	1.50	648.00	Revisions to brief in support of motion #2 for summary judgment.	ARCH
82489.27817	11/04/2020	7	A	1	620.00	1.50	837.00	Additional research on Rule 56 arguments; revise brief and affidavit.	ARCH
82489.27817	11/04/2020	7	A	1	620.00	1.00	558.00	Meeting with D. Carbone to review Memorandum of Law/legal arguments re: motion #2 for summary judgment.	ARCH
82489.27817	11/04/2020	7	A	1	620.00	1.50	837.00	Edit Memorandum of Law per meeting/comments of D. Carbone.	ARCH
82489.27817	11/04/2020	7	A	1	620.00	1.00	558.00	Multiple telephone conferences with P. Carvelas re: factual background/support for Rule 56.1 statement/motion for summary judgment.	ARCH
82489.27817	11/04/2020	7	A	1	620.00	1.50	837.00	Prepare edits to Memorandum of Law/Rule 56.1 statement per telephone conference and emails from Carvelis.	ARCH
82489.27817	11/04/2020	7	A	1	620.00	2.00	1,116.00	Continue research/drafting of Memorandum of Law re: summary judgment motion.	ARCH
82489.27817	11/05/2020	16	A	1	480.00	0.50	216.00	Revisions to brief in support of Whitestone's motion for summary judgment. TC with GMK re same. Research Judge Woods's rules on MSJ brief page limits. Corr. with GMK re same.	ARCH
82489.27817	11/05/2020	7	A	1	620.00	4.50	2,511.00	Continue drafting and edits to motion #2 summary judgment motion; supporting affidavit and conduct additional legal research on motion issues.	ARCH
82489.27817	11/05/2020	6	A	1	620.00	1.00	558.00	receipt and review of memo of law; inter-office conference with Gary re: same	ARCH
82489.27817	11/06/2020	16	A	1	480.00	5.00	2,160.00	Research authority re interpretation of "shall be bound" by ruling of prime contractor or architect. Motion # 1/motion to dismiss. Revisions to Memorandum of Law re: motion #1 motion to dismiss. Draft Rule 56 Statement of Undisputed Facts. Corr. and TC with GMK re same.	ARCH
82489.27817	11/06/2020	7	A	1	620.00	0.20	111.60	Conference with D. Carbone re: update on progress with motion for summary judgment.	ARCH
82489.27817	11/09/2020	16	A	1	480.00	1.50	648.00	Research Judge Woods's rules regarding service of hard copy motion papers. TC with GMK re same. Revisions to Statement of Undisputed Material Facts, Memorandum of Law, and Grzic declaration. Motion #2/motion for Summary Judgement	ARCH
82489.27817	11/09/2020	7	A	1	620.00	6.00	3,348.00	Final review and edits to memorandum of law, supporting declaration and Rule 56.1 statement; file with court re: Motion #2/motion for Summary Judgement	ARCH
82489.27817	11/09/2020	7	A	1	620.00	0.60	334.80	Multiple teleconferences with Phil Carvelas to verify background facts and approval of supporting declaration re: Motion #2/motion for Summary Judgement	ARCH
82489.27817	11/10/2020	16	A	1	480.00	0.40	192.00	Analyze court's email to DL re MSJ filing. Draft notice of motion. TC with GMK and corr. with DL re re-filing motion papers.	ARCH
82489.27817	11/10/2020	7	A	1	620.00	0.10	55.80	Email to A. Gill regarding request for confirmation of deposition.	ARCH
82489.27817	11/11/2020	7	A	1	620.00	0.10	55.80	Email to A. Gill with follow up query about deposition scheduling.	ARCH
82489.27817	11/11/2020	7	A	1	620.00	0.20	111.60	Email from A. Gill regarding deposition scheduling/discovery issues.	ARCH
82489.27817	11/11/2020	7	A	1	620.00	0.10	55.80	Email exchange with C. Rodriguez regarding deposition notices for Yuanda.	ARCH
82489.27817	11/11/2020	7	A	1	620.00	0.10	55.80	Review, approve deposition notices on Yuanda.	ARCH
82489.27817	11/11/2020	7	A	1	620.00	0.20	111.60	Receipt and review of letter from Yuanda's counsel	ARCH

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 16

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 82489.27817 Whitestone Construction, Corp.								
82489.27817	11/12/2020	16	A	1	480.00	1.00	432.00	regarding discovery dispute. Research authority re presumption that responding party bears expense of complying with discovery. Draft email memorandum to GMK re same. TC and corr. with GMK and Innovative Discovery re ESI protocol, schedule and cost.
82489.27817	11/12/2020	7	A	1	620.00	0.30	167.40	Teleconference with D. Carbone and P. Carvelas regarding discovery responses.
82489.27817	11/12/2020	7	A	1	620.00	0.20	111.60	Teleconference with S. Simon regarding research on duty to pay for costs associated with ESI.
82489.27817	11/12/2020	7	A	1	620.00	0.10	55.80	Review research on ESI cost responsibility.
82489.27817	11/12/2020	7	A	1	620.00	0.10	55.80	Email exchange with P. Carvelas regarding search term issues.
82489.27817	11/12/2020	7	A	1	620.00	0.20	111.60	Conference with D. Carbone regarding discovery issue.
82489.27817	11/12/2020	7	A	1	620.00	1.00	558.00	Draft responsive letter to Yuanda's counsel in response to letter of 11/11/20.
82489.27817	11/12/2020	7	A	1	620.00	0.20	111.60	Teleconference with S. Simon regarding research project on discovery issue.
82489.27817	11/12/2020	7	A	1	620.00	0.20	111.60	Teleconference with C. Rodriguez regarding discovery background facts.
82489.27817	11/12/2020	6	A	1	620.00	0.50	279.00	conf. call Phil C. re: discovery, Yuanda's letter to the court; receipt and review of Yuanda atty. e-mail exchange re: possible stip.; inter-office conference with Gary re: same
82489.27817	11/12/2020	7	A	1	620.00	0.30	167.40	Multiple emails/exchange with A. Gill re: discovery issues.
82489.27817	11/13/2020	7	A	1	620.00	0.20	111.60	Email exchange with P. Carvelas regarding document search and production of documents showing damages.
82489.27817	11/13/2020	7	A	1	620.00	0.10	55.80	Receipt and review of email from J. Dearth regarding damages summary and document production.
82489.27817	11/13/2020	7	A	1	620.00	0.20	111.60	Email exchange with A. Gill regarding document production issue.
82489.27817	11/16/2020	16	A	1	480.00	0.20	86.40	Analyze GMK letter and email from Yuanda counsel re ESI discovery. TC and corr. with GMK re same.
82489.27817	11/16/2020	6	A	1	620.00	0.10	55.80	receipt and review of James Dearth e-mail re: cost for Clerestory Work
82489.27817	11/16/2020	7	A	1	620.00	0.10	55.80	Receipt and review of email from A. Gill regarding discovery dispute (8/10).
82489.27817	11/16/2020	7	A	1	620.00	0.10	55.80	Receipt and review of letter from Yuanda's counsel addressed to court regarding Rule 56.1 statement re: Motion #2/motion for Summary Judgement
82489.27817	11/17/2020	6	A	1	620.00	0.20	111.60	mark-up Yuanda's proposed stip. of facts
82489.27817	11/17/2020	7	A	1	620.00	1.00	558.00	Receipt and review of proposed stipulation of facts; prepare edits for discussion with D. Carbone.
82489.27817	11/17/2020	7	A	1	620.00	0.20	111.60	Receipt and review of proposed facts stipulation re: motion #1 & motion #2.
82489.27817	11/18/2020	16	A	1	480.00	1.50	648.00	Conf. with GMK re logistics for remote depositions and Yuanda's demand to hold separate depositions of Whitestone's selected representative and Steven Grzic. Research SDNY authority for depositions under Rule 30(b)(6). Research remote deposition stipulations. Draft email memorandum to GMK re same. Conf. with GMK re stipulation of undisputed facts with respect to Yuanda's agreement to be bound by Sciame's rulings.
82489.27817	11/18/2020	7	A	1	620.00	0.20	111.60	Teleconference with S. Simon to discuss points to include in stipulation of facts.
82489.27817	11/18/2020	7	A	1	620.00	0.20	111.60	Teleconference with S. Simon regarding approval of prepared deposition stipulation/remote depositions.
82489.27817	11/18/2020	7	A	1	620.00	0.10	55.80	Teleconference with S. Simon regarding right to take deposition of more than one Whitestone employee.
82489.27817	11/18/2020	7	A	1	620.00	1.50	837.00	Continue drafting and editing proposed stipulation

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 17

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>								
82489.27817	11/18/2020	7	A	1	620.00	0.10	55.80 of facts re motion #1 & motion #2 Review, approve revised discovery/deposition stipulation.	ARCH
82489.27817	11/18/2020	7	A	1	620.00	1.00	558.00 Conference with D. Carbone to discuss proposed stipulation of facts and other discovery-related issues.	ARCH
82489.27817	11/18/2020	6	A	1	620.00	0.75	418.50 receipt and review of proposed stip.; inter-office conference with GK re: same, primary witness	ARCH
82489.27817	11/19/2020	6	A	1	620.00	0.20	111.60 preparation of correspondence Steven, Phil re: designated witness with knowledge	ARCH
82489.27817	11/19/2020	7	A	1	620.00	1.00	558.00 Continue to draft, edit proposed stipulation of facts; discovery dispute letter to A. Gill.	ARCH
82489.27817	11/20/2020	6	A	1	620.00	0.33	184.14 telephone conference with Steven re: designate James Dearth; inter-office conference with/ preparation of correspondence GK re: same; receipt and review of Adam Gil e-mail re: discovery, depo of Steven Grzic	ARCH
82489.27817	11/21/2020	7	A	1	620.00	0.10	55.80 Email exchange with A. Gill regarding proposed stipulation of facts/deposition scheduling.	ARCH
82489.27817	11/23/2020	44	A	5	360.00	0.80	288.00 Communicate (in firm) : Call with G. Kushner to assess the status of the action, motion practice, and discovery; Review docket, correspondence, discovery notices, and subpoena to assess status of discovery; Email corr. with James Dearth, Steven Grzic, and Phil Carvelas regarding deposition scheduling; Email corr. with counsel to Yuanda regarding stipulation of facts and discovery schedule.	ARCH
82489.27817	11/23/2020	6	A	1	620.00	0.10	55.80 receipt and review of e-mail exchange GK/Yuanda, Gil re: stip. of facts, uncooperative nature of A. Gill	ARCH
82489.27817	11/23/2020	7	A	1	620.00	1.00	558.00 Receipt and review of opposition to motion for summary judgment re: motion #2	ARCH
82489.27817	11/23/2020	7	A	1	620.00	1.00	558.00 Teleconference with A. Gill regarding resolve discovery disputes.	ARCH
82489.27817	11/23/2020	7	A	1	620.00	0.20	111.60 Teleconference with C. Rodriguez regarding deposition scheduling, assistance in discovery.	ARCH
82489.27817	11/24/2020	44	A	6	360.00	0.60	194.40 Communicate (with client) : Phone call with James Dearth regarding Yuanda discovery and deposition prep work; Email corr. with G. Kushner regarding deposition.	ARCH
82489.27817	11/24/2020	44	A	4	360.00	0.50	162.00 Review/analyze additional disclosures prepared regarding revision of damages and cross-reference with initial disclosures to assess whether any modifications are warranted.	ARCH
82489.27817	11/24/2020	7	A	1	620.00	1.00	558.00 Receipt and review Yuanda opposition to motion for summary judgment.	ARCH
82489.27817	11/24/2020	7	A	1	620.00	1.00	558.00 Research on Rule 56(d) demand; case law cited in Yuanda demand/opposition to motion for summary judgment.	ARCH
82489.27817	11/29/2020	16	A	1	480.00	1.00	432.00 Research authority re requirements for seeking Rule 56(d) stay in discovery, and basis for opposing same re: motion #3/Yuanda's request for additional discovery. Draft email memorandum to GMK re same.	ARCH
82489.27817	11/30/2020	44	A	5	360.00	0.20	72.00 Communicate (in firm) : Atty. comm. with G. Kushner regarding procedural history of the federal action.	ARCH
82489.27817	11/30/2020	7	A	1	620.00	1.00	558.00 Research on legal authority to oppose Rule 56(d) request re: motion #3/Yuanda's request for additional discovery.	ARCH
82489.27817	11/30/2020	7	A	1	620.00	1.00	558.00 Prepare draft of opposition to Rule 56(d) request re: motion #3/Yuanda's request for additional discovery.	ARCH
82489.27817	11/30/2020	16	A	1	480.00	0.50	216.00 TC with GMK re strategy for opposing Rule 56(d) motion re: motion #3/Yuanda's request for additional discovery.	ARCH

Date: 07/21/2021

Detail Fee Transaction File List  
GOETZ FITZPATRICK LLP

Page: 18

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>								
82489.27817	11/30/2020	7	A	1	620.00	0.50	279.00	ARCH
							Conference with S. Simon to frame outline for response to Yuanda Rule 56(d) request re: motion #3/Yuanda's request for additional discovery.	
82489.27817	12/01/2020	16	A	1	480.00	6.50	2,808.00	ARCH
							Research cases cited in Yuanda's Rule 56(d) request. Research authority re discovery requested is not material, relevant, germane to issue on summary judgment. Draft memorandum of law in opposition. TC and corr. with GMK re same.	
82489.27817	12/01/2020	52	A	30	360.00	0.30	97.20	ARCH
							On line research - PACER: research/obtain pacer docs from docket requested by GMK	
82489.27817	12/01/2020	44	A	4	360.00	0.90	291.60	ARCH
							Review/analyze Court notice and order regarding SJ arguments and pre-conference requirements; Call w. G. Kushner regarding discovery history for declaration in Reply to SJ, discovery issues, and deposition prep; Email corr. with A. Gill regarding settlement discussions and stip concerning discovery.	
82489.27817	12/01/2020	6	A	1	620.00	0.24	133.92	ARCH
							telephone conference with Steven re: possible settlement 80/20, legal fees reimbursable; also cost to pursue claim versus Sciamme	
82489.27817	12/01/2020	7	A	1	620.00	0.10	55.80	ARCH
							E-mail exchange with S. Grzic re: potential settlement.	
82489.27817	12/01/2020	7	A	1	620.00	0.30	167.40	ARCH
							Draft letter to Court re: extension of briefing/opposition to Rule 56(d) application.	
82489.27817	12/01/2020	7	A	1	620.00	0.20	111.60	ARCH
							E-mail from A. Gill re: request for adjournment of depositions.	
82489.27817	12/01/2020	7	A	1	620.00	0.20	111.60	ARCH
							Teleconference with A. Gill re: extension of briefing deadline; extension of deposition and settlement issues.	
82489.27817	12/01/2020	7	A	1	620.00	0.20	111.60	ARCH
							Teleconference with D. Carbone re: status update on developments in case.	
82489.27817	12/01/2020	7	A	1	620.00	0.20	111.60	ARCH
							Teleconference with C. Rodriguez re: background facts and procedural case history/discovery compliance.	
82489.27817	12/01/2020	7	A	1	620.00	1.00	558.00	ARCH
							Prepare draft of declaration in opposition to Rule 56(d) motion.	
82489.27817	12/01/2020	7	A	1	620.00	1.00	558.00	ARCH
							Continue work in MOL and supporting declaration in opposition to Yuanda's motion for additional discovery pursuant to Rule 56(d).	
82489.27817	12/01/2020	7	A	1	620.00	0.10	55.80	ARCH
							Receipt and review order directing conference for 12/7/2020 on various pending motions.	
82489.27817	12/01/2020	7	A	1	620.00	0.10	55.80	ARCH
							Email exchanges with D. Carbone re: discovery issues; coordinate schedules for taking depositions.	
82489.27817	12/02/2020	16	A	1	480.00	0.20	86.40	ARCH
							TC and corr. with GMK re opposing Rule 56(d) motion and adjournment of deadline to file.	
82489.27817	12/02/2020	44	A	4	360.00	0.30	97.20	ARCH
							Review/analyze Court Order signed by Judge Woods modifying discovery schedule.	
82489.27817	12/02/2020	7	A	1	620.00	0.10	55.80	ARCH
							Receipt and review Court notices of approval for adjournment.	
82489.27817	12/02/2020	7	A	1	620.00	0.10	55.80	ARCH
							E-mail to client re: status update on Court adjournment/deposition adjournment.	
82489.27817	12/02/2020	7	A	1	620.00	0.10	55.80	ARCH
							Receipt and review Court notice of approval for adjournment.	
82489.27817	12/02/2020	7	A	1	620.00	0.10	55.80	ARCH
							Email to client re: status update on Court adjournment/deposition adjournment.	
82489.27817	12/03/2020	6	A	1	620.00	0.10	55.80	ARCH
							receipt and review of Steve's settlement proposal	
82489.27817	12/04/2020	6	A	1	620.00	0.20	111.60	ARCH
							preparation of correspondence Steve re: same	
82489.27817	12/04/2020	7	A	1	620.00	1.00	558.00	ARCH
							Meeting with D. Carbone to review MOL/legal arguments re: motion for summary judgment.	
82489.27817	12/04/2020	7	A	1	620.00	1.50	837.00	ARCH
							Edit Memorandum of Law per meeting/comments of D. Carbone.	
82489.27817	12/04/2020	7	A	1	620.00	1.00	558.00	ARCH
							Multiple teleconferences with P. Carrelas re: factual background/support for Rule 56.1 statement/motion	

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 19

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	12/04/2020	7	A	1	620.00	1.50	837.00	for summary judgment.	
82489.27817	12/04/2020	7	A	1	620.00	2.00	1,116.00	Prepare edits to Memorandum of Law/Rule 56.1 statement per teleconference e-mails from Carrelis.	ARCH
82489.27817	12/08/2020	44	A	4	360.00	0.30	97.20	Continue research/drafting of Memorandum of Law re: summary judgment motion.	ARCH
82489.27817	12/08/2020	7	A	1	620.00	0.10	55.80	Review/analyze discovery and conference obligations, despite pending settlement communication;	ARCH
82489.27817	12/10/2020	44	A	5	360.00	0.30	97.20	E-mail from D. Carbone re: update on settlement; proposed with opposition to Rule 56(d) application.	ARCH
82489.27817	12/10/2020	16	A	1	480.00	0.10	43.20	Communicate (in firm) : Atty conf. with G. Kushner regarding settlement discussions, motion practice, and discovery.	ARCH
82489.27817	12/10/2020	6	A	1	620.00	0.50	279.00	Conf. with GMK re attorneys' fees provision in purchase order.	ARCH
82489.27817	12/10/2020	7	A	1	620.00	0.20	111.60	inter-office conference with GK re: reply to Yuanda arguments, motion for SJ	ARCH
82489.27817	12/10/2020	7	A	1	620.00	0.10	55.80	Teleconference with C. Rodriguez re: status update on settlement.	ARCH
82489.27817	12/10/2020	7	A	1	620.00	0.40	223.20	Review purchase order to ascertain attorneys' fees provision.	ARCH
82489.27817	12/11/2020	16	A	1	480.00	0.10	43.20	Teleconference with D. Carbone re: settlement angle/case strategy.	ARCH
82489.27817	12/11/2020	7	A	1	620.00	0.10	55.80	Corr. with GMK re opposition to Yuanda's Rule 56(d) request.	ARCH
82489.27817	12/11/2020	7	A	1	620.00	2.00	1,116.00	Conference with D. Carbone re: status on settlement talks with Yuanda; proceed with preparing opposition to Rule 56(d) motion.	ARCH
82489.27817	12/11/2020	7	A	1	620.00	0.10	55.80	Continue drafting and editing opposition to Rule 56(d) motion.	ARCH
82489.27817	12/14/2020	16	A	1	480.00	0.40	172.80	Receipt and review email from A. Gill re: deposition scheduling.	ARCH
82489.27817	12/14/2020	7	A	1	620.00	4.50	2,511.00	TC with GMK re opposition to Rule 56(d) request.	ARCH
82489.27817	12/14/2020	7	A	1	620.00	0.20	111.60	Continue to research case law in opposition to Rule 56(d) demand; continue to draft and edit opposition to Rule 56(d) demand and draft Gary M. Kushner declaration to support opposition to Rule 56(d) demand.	ARCH
82489.27817	12/14/2020	7	A	1	620.00	0.20	111.60	Conference with S. Simon to dismiss merits of opposing Rule 56(d) demand on the basis that Yuanda was not diligent in completing discovery.	ARCH
82489.27817	12/15/2020	16	A	1	480.00	4.00	1,728.00	Research authority re failure to diligently pursue discovery as basis for denying Rule 56(d) motion. Revisions to memorandum of law in opposition to Rule 56(d) motion. Revisions to GMK declaration. TC with GMK re same.	ARCH
82489.27817	12/15/2020	44	A	4	360.00	0.40	129.60	Review/analyze history of discovery and responses thereto between WCC and Yuanda; Email corr. with G. Kushner summarizing service, response, and dispute history concerning discovery.	ARCH
82489.27817	12/15/2020	7	A	1	620.00	5.50	3,069.00	Review, revise multiple drafts of memo of law, supporting declaration in opposition to Yuanda's Rule 56(d) demand.	ARCH
82489.27817	12/15/2020	7	A	1	620.00	0.10	55.80	Attend to supplemental document production on damages calculation.	ARCH
82489.27817	12/15/2020	7	A	1	620.00	0.10	55.80	Multiple email exchanges with C. Rodriguez re: discovery history.	ARCH
82489.27817	12/16/2020	44	A	4	360.00	0.30	97.20	Review/analyze discovery demands, documents produced, and assess whether additional responsive documents are warranted.	ARCH
82489.27817	12/17/2020	16	A	1	480.00	0.40	172.80	Corr. with GMK re preparation for hearing on summary judgment motion.	ARCH
82489.27817	12/17/2020	7	A	1	620.00	0.10	55.80	Receipt and review email from A. Gill re: approval of appearance form required by Court.	ARCH

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 20

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	12/18/2020	7	A	1	620.00	0.20	111.60	Email exchange with A. Gill on deposition scheduling issues.	ARCH
82489.27817	12/20/2020	7	A	1	620.00	0.20	111.60	Receipt and review multiple emails from A. Gill re: discovery issues and deposition protocols.	ARCH
82489.27817	12/21/2020	52	A	5	360.00	0.70	226.80	Communicate (in firm) with G. Kushner regarding action; per GMK, prepare/file notice of appearance in the action. order transcript of hearing/conference; correspondence to/from opposing counsel and reporter	ARCH
82489.27817	12/21/2020	44	A	5	360.00	0.30	97.20	Communicate (in firm) : Atty conf. with G. Kushner regarding outcome of Yuanda conference with Court on dispositive motion practice and case strategy moving forward.	ARCH
82489.27817	12/21/2020	6	A	1	620.00	0.20	111.60	inter-office conference with Gary re: conf. with Judge, denied all motions	ARCH
82489.27817	12/21/2020	7	A	1	620.00	2.00	1,116.00	Prepare for argument on Rule 12(c) motion; Rule 56 motion and Rule 56(d) motion.	ARCH
82489.27817	12/21/2020	7	A	1	620.00	1.20	669.60	Participate in teleconference/hearing with Court re: Rule 12(c) motion #1, Rule 56 motion #2 and Rule 56(d) motion #3.	ARCH
82489.27817	12/21/2020	7	A	1	620.00	0.20	111.60	Conference with D. Carbone re: outcome of Court's ruling on various motions; next step.	ARCH
82489.27817	12/21/2020	7	A	1	620.00	0.20	111.60	Conference with D. Carbone re: outcome of Court's ruling on various motions; next step.	ARCH
82489.27817	12/21/2020	7	A	1	620.00	0.10	55.80	Teleconference with Court reporter for expedited transcript/ruling conference; discuss with B. Blum.	ARCH
82489.27817	12/22/2020	16	A	1	480.00	0.40	172.80	TC with GMK re results of hearing on Yuanda's 12(c) motion and Whitestone's MSJ.	ARCH
82489.27817	12/22/2020	52	A	5	360.00	0.30	97.20	Communicate (in firm): intraoffice conference with G. Kushner regarding discovery issue post-motion for summary judgment	ARCH
82489.27817	12/22/2020	52	A	4	360.00	1.50	486.00	Review/analyze motion documents with respect to architectural issue as to reasons for Sciamme rejection of Whitestone PCO; draft SDNY subpoena	ARCH
82489.27817	12/22/2020	7	A	1	620.00	1.00	558.00	Draft status memo for client re: Court rulings.	ARCH
82489.27817	12/22/2020	7	A	1	620.00	0.20	111.60	Conference with B. Blum re: preparation and service of subpoena upon architect.	ARCH
82489.27817	12/23/2020	52	A	3	360.00	2.10	680.40	Draft document request to subpoena of architect Perkins Eastman	ARCH
82489.27817	12/23/2020	7	A	1	620.00	0.30	167.40	Teleconference with A. Gill re: settlement revival; next steps in litigation.	ARCH
82489.27817	12/23/2020	7	A	1	620.00	0.20	111.60	Teleconference with A. Gill re: outstanding discovery issues; next steps in litigation.	ARCH
82489.27817	12/23/2020	7	A	1	620.00	0.20	111.60	Email from A. Gill re: discovery demands.	ARCH
82489.27817	12/23/2020	7	A	1	620.00	0.10	55.80	Review, approve deposition protocol.	ARCH
82489.27817	12/24/2020	7	A	1	620.00	0.10	55.80	Email to P. Carvelas re: follow up request for document production.	ARCH
82489.27817	12/24/2020	7	A	1	620.00	0.10	55.80	Email to B. Blum re: follow up on architect's subpoena and document demand.	ARCH
82489.27817	12/24/2020	7	A	1	620.00	0.10	55.80	Review, edit draft of subpoena re: architect.	ARCH
82489.27817	12/28/2020	52	A	4	360.00	0.50	162.00	Review/analyze transcript of December 21, 2020 Court Conference regarding parties' motion(s) for judgment on the pleadings and partial summary judgment; email to opposing counsel regarding transcript; review emails from court reporters	ARCH
82489.27817	12/28/2020	44	A	4	360.00	0.20	64.80	Review/analyze Court Order executed by Judge Woods regarding proposed deposition stipulation, ordering parties to strictly adhere to Federal Rules and Judge's specific rules of Court.	ARCH
82489.27817	12/29/2020	7	A	1	620.00	0.10	55.80	Conference with D. Carbone re: discovery issues.	ARCH
82489.27817	12/29/2020	7	A	1	620.00	0.30	167.40	Review transcript of Court ruling on summary judgment; motion to dismiss.	ARCH
82489.27817	12/29/2020	7	A	1	620.00	0.50	279.00	Complete draft of memo to client re: status update.	ARCH
82489.27817	12/30/2020	6	A	1	620.00	2.00	1,116.00	review of file re: prep. for limited discovery; review of	ARCH



Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 21

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>								
							WCC N of Dispute, Descript. of Dispute, Contract/PO, etc.	
82489.27817	01/04/2021	7	A	1	620.00	0.10	55.80 Conference with D. Carbone re: deposition assignment.	ARCH
82489.27817	01/04/2021	7	A	1	620.00	0.40	223.20 Attend to discovery issues.	ARCH
82489.27817	01/05/2021	7	A	1	620.00	0.20	111.60 Email exchange with D. Carbone re: discover issues.	ARCH
82489.27817	01/05/2021	52	A	3	365.00	0.60	219.00 Revise non-party subpoena of Architect Perkins Eastman per G. Kushner edits; finalize same; correspondence with Gotham Process Service to request service of non-party subpoena ASAP and follow-up correspondence to Adam Gill Esq. with courtesy copy of subpoena	ARCH
82489.27817	01/05/2021	7	A	1	620.00	0.20	111.60 Email exchange with A. Gill re: discovery dispute; deposition scheduling; review, edit and finalize.	ARCH
82489.27817	01/05/2021	7	A	1	620.00	0.20	111.60 Review, edit and finalize document demand, notice of deposition and subpoena on project architect; conference with B. Blum re: service instructions/subpoena.	ARCH
82489.27817	01/05/2021	7	A	1	620.00	0.10	55.80 Email exchange with A. Gill re: deposition issues/discovery disputes.	ARCH
82489.27817	01/06/2021	52	A	7	365.00	0.10	36.50 Communicate (other outside counsel): review correspondence between G. Kushner and Adam Gill Esq. regarding outstanding disclosure issues	ARCH
82489.27817	01/06/2021	7	A	1	620.00	0.20	111.60 Email exchange with A. Carvelas re: supplemental document production.	ARCH
82489.27817	01/06/2021	7	A	1	620.00	0.30	167.40 Email exchange with A. Gill re: discovery issues.	ARCH
82489.27817	01/06/2021	7	A	1	620.00	0.50	279.00 Teleconference with D. Carbone re: review of purchase order to analyze claim for attorneys' fees and indemnification.	ARCH
82489.27817	01/06/2021	6	A	1	650.00	0.93	544.05 inter-office conference with GK re: par. 19 attorney fees both Yuanda lawsuit, Sciamé lawsuit, possible amendment to complaint; preparation of correspondence Yuanda atty. re: deposition dates; exchange e-mails with James Dearth re: EBT prep.; review of deposition protocols	ARCH
82489.27817	01/07/2021	52	A	29	365.00	0.30	109.50 Pacer Research to obtain last scheduling order; review amended answer by defendant Yuanda	ARCH
82489.27817	01/07/2021	44	A	4	375.00	0.30	101.25 Review/analyze Amended Answer filed by Yuanda to insert affirmative defense for failure of condition precedent.	ARCH
82489.27817	01/07/2021	7	A	1	620.00	1.00	558.00 Edit/finalize letter to A. Gill re: response to discovery dispute email.	ARCH
82489.27817	01/07/2021	7	A	1	620.00	0.20	111.60 Conference with D. Carbone to discuss discovery schedule and witness testimony; issues for deposition.	ARCH
82489.27817	01/07/2021	7	A	1	620.00	0.10	55.80 Receipt and review email from A. Gill re: deposition scheduling and discovery issues.	ARCH
82489.27817	01/07/2021	7	A	1	620.00	1.00	558.00 Draft, edit and finalize responsive letter to Gill re: discovery issues.	ARCH
82489.27817	01/07/2021	7	A	1	620.00	0.10	55.80 Conference with D. Carbone re: update on discovery issues.	ARCH
82489.27817	01/07/2021	6	A	1	650.00	2.00	1,170.00 e-mail exchange James re: prep. for EBT; telephone conference with Phil re: factual background, key issues; inter-office conference with EBT dates for Charles Wang; prep. exhibits for depositions; telephone conference with Steven re: analysis - better chance of recovery money from Yuanda vs. Sciamé	ARCH
82489.27817	01/08/2021	52	A	7	365.00	0.20	73.00 Communicate (other outside counsel): correspondence with A. Gill regarding W9 issue for Yuanda to issue payment for 1/2 of transcript costs; correspondence with Assistant Controller to obtain W9 form; follow up correspondence with A. Gill to forward W9 and request payment update	ARCH

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 22

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	01/08/2021	6	A	1	650.00	4.00	2,340.00	meeting with James Dearth; prep. for EBT	ARCH
82489.27817	01/08/2021	7	A	1	620.00	3.50	1,953.00	Participate in deposition counseling of J. Dearth.	ARCH
82489.27817	01/08/2021	7	A	1	620.00	0.30	167.40	Finalize letter to Gill with discovery dates and document production.	ARCH
82489.27817	01/11/2021	7	A	1	620.00	0.10	55.80	Email exchange with A. Gill re: deposition scheduling.	ARCH
82489.27817	01/11/2021	52	A	5	365.00	0.40	146.00	Communicate (in firm): call with G. Kushner regarding deposition notices served; calendar deposition dates per notice(s); research regarding form notice to admit	ARCH
82489.27817	01/11/2021	52	A	3	365.00	0.60	219.00	Research FRCP Rule 36 requests for admission; Draft "form" request for admission per G. Kushner request	ARCH
82489.27817	01/11/2021	7	A	1	620.00	0.10	55.80	Receipt and review email from A. Gill re: new notices of deposition.	ARCH
82489.27817	01/11/2021	7	A	1	620.00	0.20	111.60	Conference with B. Blum re: timeline under Federal Rule to object to notice of deposition without subpoena.	ARCH
82489.27817	01/11/2021	7	A	1	620.00	0.10	55.80	Receipt and review of amended notice of deposition/Grzic.	ARCH
82489.27817	01/12/2021	7	A	1	620.00	0.30	167.40	Draft, edit and finalize letter to A. Gill with dispute concerning deposition.	ARCH
82489.27817	01/12/2021	7	A	1	620.00	0.20	111.60	Attend to discovery issues.	ARCH
82489.27817	01/12/2021	44	A	5	375.00	0.30	101.25	Communicate (in firm) : Email corr. with G. Kushner regarding deposition notices on Yuanda; Review service records and email corr.	ARCH
82489.27817	01/12/2021	7	A	1	620.00	0.10	55.80	Email from A. Gill regarding deposition logistics for Tan.	ARCH
82489.27817	01/13/2021	7	A	1	620.00	0.10	55.80	Letter to Gill regarding rejection of deposition notice/Grzic.	ARCH
82489.27817	01/14/2021	52	A	7	365.00	0.10	36.50	Communicate (other outside counsel): review correspondence from Adam Gill Esq.	ARCH
82489.27817	01/14/2021	7	A	1	620.00	0.20	111.60	Teleconference with D. Carbone re: remote deposition protocol issues and related discovery.	ARCH
82489.27817	01/14/2021	7	A	1	620.00	0.50	279.00	Receipt and review emails & voicemail from A. Gill re: meet and confer; respond to Gill emails.	ARCH
82489.27817	01/15/2021	16	A	1	495.00	2.00	891.00	Analyze Yuanda's letter to Judge Woods re Grzic deposition. Research cases cited by Yuanda in letter. Research authority re 30(b)(1) deposition notices. Conf. with GMK re response to letter. Draft Whitestone's response to Yuanda's letter. TC with GMK re revisions to letter. Revise letter.	ARCH
82489.27817	01/15/2021	7	A	1	620.00	0.20	111.60	Receipt and review email/letter from A. Gill re: joint letter to Court/Grzic discounts.	ARCH
82489.27817	01/15/2021	7	A	1	620.00	0.30	167.40	Receipt and review letter from Gill re: joint letter to Court/discovery dispute.	ARCH
82489.27817	01/15/2021	7	A	1	620.00	0.60	334.80	Teleconference with S. Simon re: research on legal authority to respond to Yuanda's motion to compel Grzic deposition.	ARCH
82489.27817	01/15/2021	7	A	1	620.00	1.00	558.00	Research on legal authority to object to Grzic deposition notice; research file for previous discovery responses.	ARCH
82489.27817	01/15/2021	7	A	1	620.00	0.50	279.00	Review, edit draft of letter to Court re: deposition dispute.	ARCH
82489.27817	01/15/2021	7	A	1	620.00	0.20	111.60	Teleconference with D. Carbone re: discuss Yuanda motion to compel/discovery dispute.	ARCH
82489.27817	01/17/2021	16	A	1	495.00	0.40	178.20	Revisions to letter to Judge Woods. Corr. with GMK re same.	ARCH
82489.27817	01/17/2021	7	A	1	620.00	0.30	167.40	Continue work on drafting Whitestone portion of joint letter to court on discovery dispute.	ARCH
82489.27817	01/18/2021	44	A	5	375.00	0.20	67.50	Communicate (in firm) : Call with D. Carbone regarding exhibits needed to review for Yuanda deposition prep.	ARCH
82489.27817	01/18/2021	7	A	1	620.00	1.00	558.00	Inter-office conference with D. Carbone to discuss upcoming deposition of Dearth and related issues;	ARCH



Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 23

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>								
							email to D. Carbone with various documents associated with the upcoming deposition.	
82489.27817	01/18/2021	7	A	1	620.00	0.20	111.60 Multiple emails to Gill re: joint discovery letters.	ARCH
82489.27817	01/18/2021	44	A	4	375.00	1.10	371.25 Review/analyze and organize documents in preparation for Dearth deposition.	ARCH
82489.27817	01/18/2021	44	A	6	375.00	0.20	67.50 Communicate (with client) : Call with James Dearth regarding additional discovery tendered for action.	ARCH
82489.27817	01/18/2021	44	A	4	375.00	1.10	371.25 Review/analyze discovery to cross-reference additional documents provided by James Dearth to parse out what documents need to be produced.	ARCH
82489.27817	01/18/2021	6	A	1	650.00	2.93	1,714.05 receipt and review of Stip. re: conducting EBTs; revised notices for James/Steven; inter-office conference with Gary re: Yuanda revised 1/11 bt Notice still oppose EBT of Steven; telephone conference with James Dearth re: second prep. session, additional phone call as well; e-mail exchange Steven re: Friday EBT, motion; review of file, prep. for EBT of Charles Tan	ARCH
82489.27817	01/18/2021	7	A	1	620.00	0.60	334.80 Continue addressing Gill's emails about motion to compel deposition of Grzic.	ARCH
82489.27817	01/19/2021	52	A	4	365.00	0.40	146.00 Review/analyze Adam Gill Esq. "joint letter" submitted to Hon. Gregory Woods USDJ; finalize G. Kushner letter in response for filing; electronically file same	ARCH
82489.27817	01/19/2021	44	A	4	375.00	2.80	945.00 Review/analyze, organize, and produce documents to opposing counsel which have been tendered by James Dearth; Confer w. D. Carbone regarding discovery which must be produced; Review discovery needed for use during deposition.	ARCH
82489.27817	01/19/2021	6	A	1	650.00	4.75	2,778.75 prep. session James Dearth for EBT by Yuanda	ARCH
82489.27817	01/19/2021	7	A	1	620.00	1.00	558.00 Engage in multiple email exchange with A. Gill re: discovery dispute with Yuanda/Grzic deposition.	ARCH
82489.27817	01/19/2021	7	A	1	620.00	0.50	279.00 Draft, edit and finalize letter to Court re: discovery dispute with Yuanda.	ARCH
82489.27817	01/19/2021	7	A	1	620.00	0.20	111.60 Teleconference of D. Carbone re: general preparation for upcoming deposition.	ARCH
82489.27817	01/19/2021	7	A	1	620.00	0.20	111.60 Teleconference with C. Rodriguez, re: discovery issues	ARCH
82489.27817	01/20/2021	52	A	4	365.00	0.20	73.00 Review/analyze Court order setting telephonic pre-motion conference; review court rules/calendar same	ARCH
82489.27817	01/20/2021	52	A	3	365.00	0.20	73.00 Draft required Case Appearance Form per G. Kushner request; forward case appearance form to Adam Gill Esq./Frank Dylewski Esq. for approval and filing. File Case Appearance Sheet with Judge Woods chambers pursuant to Part Rules by email.	ARCH
82489.27817	01/20/2021	44	A	4	375.00	0.20	67.50 Review/analyze Court Notice regarding motion to compel Grzic testimony, review conference requirements per Judge's rules.	ARCH
82489.27817	01/20/2021	7	A	1	620.00	1.00	558.00 Teleconference (2x) with Donald Carbone to discuss Fed. Rules; background issues with Gill and Dearth deposition; scheduling and production of S. Grzic.	ARCH
82489.27817	01/20/2021	7	A	1	620.00	0.50	279.00 Multiple email exchange with Gill re: Grzic deposition/scheduling.	ARCH
82489.27817	01/20/2021	7	A	1	620.00	0.10	55.80 Receipt and review notice from Court re: scheduling of conference to discuss discovery dispute.	ARCH
82489.27817	01/20/2021	7	A	1	620.00	0.10	55.80 Inter-office conference with B. Blum to prepare Court appearance sign in sheet.	ARCH
82489.27817	01/20/2021	6	A	1	650.00	5.50	3,217.50 defend deposition of James Dearth; follow-up conversation Yuanda atty. Gill re: grzic EBT and scheduling; inter-office conference with Gary K. re: same; telephone conference with Steven re: same	ARCH
82489.27817	01/21/2021	16	A	1	495.00	0.20	89.10 Research SDNY local rules re telephonic meet and confer. TC and corr. with GMK re same.	ARCH

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 24

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	01/21/2021	7	A	1	620.00	1.00	558.00	Prepare for Court conference.	ARCH
82489.27817	01/21/2021	52	A	5	365.00	0.30	109.50	Communicate (in firm): teleconference with C. Rodriguez regarding Perkins Eastman subpoena and other deposition prep issues; provide copies of same to C. Rodriguez	ARCH
82489.27817	01/21/2021	44	A	4	375.00	5.60	1,890.00	Review/analyze discovery to identify documents needed for deposition testimony; conf. with D. Carbone to discuss additional items which need to be located and identified.	ARCH
82489.27817	01/21/2021	6	A	1	650.00	4.40	2,574.00	review of file; prep. for EBT of Steven/Tan	ARCH
82489.27817	01/21/2021	7	A	1	620.00	1.00	558.00	Participate in Court conference to resolve dispute re: Grzic deposition.	ARCH
82489.27817	01/22/2021	6	A	1	650.00	3.66	2,141.10	review of file, cont. prep. for Steven EBT; prep. Steven for EBT; e-mail exchange Veritex re: EBT of Mr. Tan interpreter	ARCH
82489.27817	01/25/2021	52	A	29	365.00	1.80	657.00	Research issue regarding proper line of deposition testimony about witness preparation/coaching	ARCH
82489.27817	01/25/2021	52	A	3	365.00	0.80	292.00	Draft intraoffice memorandum regarding whether or not attorney/client conferences are allowed in SDNY cases	ARCH
82489.27817	01/25/2021	44	A	8	375.00	0.60	202.50	Communicate (other external) : Call with Mindy No, lead architect on CUNY job, regarding subpoena served on Perkins Eastman, email corr. with Jaimie Weller, counsel to Perkins Eastman regarding outstanding subpoena.	ARCH
82489.27817	01/25/2021	7	A	1	620.00	0.10	55.80	Conference with D. Carbone re: status on document production from architect.	ARCH
82489.27817	01/25/2021	7	A	1	620.00	0.10	55.80	Conference with B. Blum re: update on architect deposition issues.	ARCH
82489.27817	01/25/2021	6	A	1	650.00	0.20	117.00	receipt and review of follow-up e-mail re: lack of Perkins' response to Subpoena; inter-office conference with Chris re: same; inter-office conference with Ben re: Yuanda's attorney legal issue of coaching	ARCH
82489.27817	01/26/2021	52	A	5	365.00	0.10	36.50	Communicate (in firm) with D. Carbone about additional research needed	ARCH
82489.27817	01/26/2021	52	A	29	365.00	2.10	766.50	Research regarding witness coaching/revise memo accordingly	ARCH
82489.27817	01/26/2021	6	A	1	650.00	2.66	1,556.10	legal research re: Yuanda's attorney's claims regarding coaching; preparation of correspondence Steven confirming EBT; legal research re: witness coaching; prep. exhibits for Charles Tan's EBT	ARCH
82489.27817	01/27/2021	44	A	8	375.00	0.40	135.00	Communicate (other external) : Review documents to ensure bates-stamp and production of all relevant documents; Email corr. with opposing counsel serving bates-stamped discovery; Conf. with DJC to discuss discovery and items needed for Yuanda deposition.	ARCH
82489.27817	01/27/2021	44	A	4	375.00	0.50	168.75	Review/analyze DJC deposition documents to ensure that all items have been properly marked, identified, and produced in formal discovery; Conf. w. DJC to confirm usage of Architect mark-ups.	ARCH
82489.27817	01/27/2021	52	A	4	365.00	0.20	73.00	Review/analyze docket per GMK, update letter accordingly with docket entries	ARCH
82489.27817	01/27/2021	44	A	8	375.00	1.10	371.25	Communicate (other external) : Email corr. and phone call with Jamie Weller, in-house counsel to Yuanda, to address outstanding subpoena and production of documents and deposition; cross-referencing discovery deadlines from court with subpoena requirements; Conf. with G. Kushner and D. Carbone regarding issues concerning Perkins Eastman disclosure and need for letter motion to the Court.	ARCH
82489.27817	01/27/2021	7	A	1	620.00	0.10	55.80	Inter-office conference with C. Rodriguez re: update	ARCH

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 25

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
Client ID 82489.27817 Whitestone Construction, Corp.									
82489.27817	01/27/2021	6	A	1	650.00	4.85	2,837.25	on architect's compliance with subpoena.	ARCH
82489.27817	01/27/2021	7	A	1	620.00	0.30	167.40	defend Steven's EBT	ARCH
82489.27817	01/27/2021	7	A	1	620.00	0.30	167.40	Prepare, edit draft of joint letter to Court re: extension of fact discovery deadline.	ARCH
82489.27817	01/27/2021	7	A	1	620.00	0.30	167.40	Finalize letter to Court re: modification of scheduling order.	ARCH
82489.27817	01/28/2021	7	A	1	620.00	0.50	279.00	Email to Adam Gill with proposed joint letter to Court/extension.	ARCH
82489.27817	01/28/2021	44	A	8	375.00	0.20	67.50	Communicate (other external) : Email corr. with J. Weller, in-house counsel to Perkins Eastman, regarding subpoena for documents and timeframe for production.	ARCH
82489.27817	01/28/2021	52	A	5	365.00	0.10	36.50	Communicate (in firm): call with C. Rodriguez about Perkins Eastman Subpoena	ARCH
82489.27817	01/29/2021	52	A	4	365.00	0.20	65.70	Review/analyze court order granting extension of discovery; calendar updated fact disclosure end date	ARCH
82489.27817	01/29/2021	44	A	8	375.00	0.50	168.75	Communicate (other external) : Email corr. with J. Weller, in-house counsel to P.E., regarding outstanding subpoena and new Order mandated by Judge Woods, demanding production of discovery; Atty. conf. w. G. Kushner regarding same; Review order rendered by Judge Woods.	ARCH
82489.27817	01/29/2021	6	A	1	650.00	0.50	292.50	organize exhibits to be sent to Yuanda counsel for Charles Tan EBT; preparation of correspondence Atty. Gil re: same	ARCH
82489.27817	02/01/2021	7	A	1	620.00	0.10	55.80	Review expert report; email to DJC re: need for a subpoena/deposition.	ARCH
82489.27817	02/01/2021	7	A	1	620.00	0.10	55.80	E-mail exchange with D. Carbone re: opinion about Yuanda's expert report.	ARCH
82489.27817	02/02/2021	6	A	1	650.00	0.33	193.05	receipt and review of purported expert report; preparation of correspondence Steven, et al. re: same	ARCH
82489.27817	02/02/2021	7	A	19	620.00	0.10	55.80	E-mail exchange with D. Carbone re: opinion about Yuanda's expert report.	ARCH
82489.27817	02/02/2021	7	A	19	620.00		0.00	Asset Disposition	ARCH
82489.27817	02/03/2021	44	A	8	375.00	0.30	101.25	Communicate (other external) : Email corr. with in-house counsel to Perkins Eastman regarding outstanding disclosure; Email corr. with Gary and Donald regarding same.	ARCH
82489.27817	02/03/2021	44	A	3	375.00	1.80	607.50	Draft/revise letter to Judge Woods seeking leave to file a motion to compel non-party discovery from Perkins Eastman, cross-referencing with Judge Woods' Rules and the Fed. Rules of Civ. Pro.; Prepare email to J. Weller to establish meet and confer requirements of the Fed. Rules and Judge Woods' Rules of Practice.	ARCH
82489.27817	02/03/2021	7	A	1	620.00	0.10	55.80	Email to C. Rodriguez re: update on obtaining discovery from architect.	ARCH
82489.27817	02/03/2021	7	A	1	620.00	0.10	55.80	Review, draft letter to Court re: extension of discovery deadlines and third-party discovery of architect.	ARCH
82489.27817	02/03/2021	7	A	1	620.00	0.10	55.80	Email from D. Carbone re: status inquiry/Perkins document production.	ARCH
82489.27817	02/04/2021	44	A	3	375.00	0.40	135.00	Draft/revise letter to Judge Woods pursuant to comments from G. Kushner; Email corr. with J. Weller advising that we intend to compel Perkins Eastman's compliance.	ARCH
82489.27817	02/04/2021	44	A	8	375.00	0.50	168.75	Communicate (other external) : Phone call with Ms. Weller from Perkins Eastman regarding the outstanding subpoena and Perkins Eastman's refusal to comply and furnish documents and a witness for deposition; Email corr. with G. Kushner and D. Carbone regarding next steps.	ARCH
82489.27817	02/04/2021	52	A	5	365.00	0.50	182.50	Communicate (in firm): teleconference w. C.	ARCH

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 26

	<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 82489.27817 Whitestone Construction, Corp.										
									Rodriguez regarding motion to compel response to subpoena; review Judge Woods Part Rules regarding filing of discovery motions/orders to show cause; research FRCP regarding motion(s) to compel subpoena response	
82489.27817	02/04/2021	52	A		5	365.00	0.40	146.00	Communicate (in firm): teleconference with C. Rodriguez regarding scope of Perkins Eastman non-party subpoena and reason(s) for serving it; review transcript of court conference held on December 21, 2020 with respect to disclosure issue	ARCH
82489.27817	02/04/2021	44	A		6	375.00	0.30	101.25	Communicate (with client) : Call with James Dearth regarding Perkins Eastman's involvement in declaring work non-conforming in order to identify documents and communications that would be subject to subpoena that are not in Whitestone's possession.	ARCH
82489.27817	02/04/2021	44	A		8	375.00	0.70	236.25	Communicate (other external) : Email corr. with counsel to Perkins Eastman regarding its inadequate response to Whitestone's subpoena; Conf. with G. Kushner regarding same.	ARCH
82489.27817	02/04/2021	44	A		3	375.00	0.80	270.00	Revise letter to the Court to encompass additional communications had with counsel to Perkins Eastman.	ARCH
82489.27817	02/04/2021	44	A		8	375.00	0.30	101.25	Communicate (other external) : Email corr. with Adam Gill to obtain Yuanda's consent to the letter request to Judge Woods.	ARCH
82489.27817	02/04/2021	44	A		3	375.00	2.20	742.50	Research and begin drafting motion to compel Perkins Eastman's compliance with subpoena.	ARCH
82489.27817	02/04/2021	7	A		1	620.00	0.30	167.40	Multiple teleconferences with C. Rodriguez re: form of letter to Judge Woods/discovery dispute with Perkins Eastman.	ARCH
82489.27817	02/04/2021	6	A		1	650.00	5.75	3,363.75	preparation of correspondence Atty. Gil mark Yuanda Tech Report at plaintiff's 25; preparation of correspondence Veritext; review of file; prep. for EBT; deposition of Charles Tan	ARCH
82489.27817	02/05/2021	44	A		4	375.00	0.80	270.00	Review/analyze Dearth deposition transcript and marked exhibits retrieved from Veritext; Email corr. with James Dearth providing instruction on the review and certification of the deposition transcript.	ARCH
82489.27817	02/05/2021	44	A		3	375.00	1.40	472.50	Revise letter correspondence to Judge Woods requesting a pre-motion conference on the motion to compel disclosure from Perkins Eastman; Finalize and file letter to the Court; Email corr. with Counsel to Perkins Eastman and A. Gill to provide notice of the filed letter.	ARCH
82489.27817	02/05/2021	7	A		1	620.00	0.10	55.80	Follow-up email to C. Rodriguez re: discovery motion/letter to Court about Perkins Eastman non-compliance.	ARCH
82489.27817	02/05/2021	44	A		3	375.00	3.30	1,113.75	Draft/revise motion to compel Perkins Eastman's compliance with non-party subpoena.	ARCH
82489.27817	02/08/2021	52	A		5	365.00	0.20	73.00	Communicate (in firm): teleconference with C. Rodriguez regarding service of nonparty subpoena of Perkins Eastman upon Yuanda's counsel; forward copy of transmittal email of January 5, 2021 to Adam Gill Esq. on behalf of Yuanda	ARCH
82489.27817	02/08/2021	44	A		3	375.00	6.40	2,160.00	Draft/revise motion to compel non-party Perkins Eastman to comply with subpoena.	ARCH
82489.27817	02/08/2021	50	A		1	310.00	0.75	232.50	research future objection to subpoena after untimely motion to quash	ARCH
82489.27817	02/08/2021	50	A		1	310.00	0.75	232.50	research federal procedure and warning required for notice of contempt proceedings.	ARCH
82489.27817	02/09/2021	44	A		3	375.00	6.40	2,160.00	Draft/revise motion to compel Perkins Eastman to produce documents pursuant to non-party Subpoena.	ARCH

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 27

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	02/09/2021	7	A	1	620.00	0.10	55.80	Email to C. Rodriguez regarding update on OSC/Perkins Eastman.	ARCH
82489.27817	02/09/2021	7	A	1	620.00	1.00	558.00	Review, edit prepared declaration/memo of law in support of motion to compel.	ARCH
82489.27817	02/10/2021	52	A	5	365.00	0.20	73.00	Communicate (in firm): teleconference with C. Rodriguez regarding application provisions of service of order to show cause	ARCH
82489.27817	02/10/2021	44	A	3	375.00	7.60	2,565.00	Revise motion to compel pursuant to comments provided by Gary M. Kushner, organizing and reviewing all moving papers and exhibits to ensure compliance with Federal Rules; Finalize Order to Show Cause, Rodriguez Declaration, Memorandum of Law and all exhibits and file same through SDNY ECF.	ARCH
82489.27817	02/10/2021	7	A	1	620.00	0.20	111.60	Teleconference with C. Rodriguez to discuss revisions to OSC/Memo of law.	ARCH
82489.27817	02/10/2021	7	A	1	620.00	0.50	279.00	Review, edit second draft of motion to compel.	ARCH
82489.27817	02/10/2021	6	A	1	650.00	0.20	117.00	preparation of correspondence court reporter ordering transcript	ARCH
82489.27817	02/11/2021	52	A	4	365.00	0.60	219.00	Review/analyze order to show cause for contempt against non-party perkins eastman; calendar return dates; teleconference with C. Rodriguez regarding service of OSC	ARCH
82489.27817	02/12/2021	44	A	4	375.00	1.10	371.25	Review/analyze Order to Show Cause signed by Judge Gregory Woods, serve pleadings as required by the Order to Show Cause, assess all requirements posited by Judge; Email corr. with Jamie Weller regarding service of Order to Show Cause and outcome thereof; Conf. w. G. Kushner regarding Order to Show Cause.	ARCH
82489.27817	02/12/2021	52	A	5	365.00	0.40	146.00	Communicate (in firm): teleconference with C. Rodriguez regarding service of OSC/certifications of service/conformed copies	ARCH
82489.27817	02/12/2021	44	A	3	375.00	0.40	135.00	Draft/revise and file affidavit of service on SDNY ECF system; EMail corr. with Adam Gill providing courtesy copy of Order to Show Cause documents.	ARCH
82489.27817	02/12/2021	44	A	5	375.00	0.30	101.25	Communicate (in firm) : Atty conf. with G. Kushner regarding order to show cause on perkins eastman and overall case strategy.	ARCH
82489.27817	02/16/2021	44	A	6	375.00	0.30	101.25	Communicate (with client) : Email corr. and Phone call with James Dearth regarding reviewing, revising, and signing his deposition transcript.	ARCH
82489.27817	02/19/2021	44	A	4	375.00	0.60	202.50	Review/analyze Order to Show Cause for response required by Perkins Eastman, review court docket to check for any ancillary filing made without ECF, confirm no response filed by Perkins Eastman, and phone call with G. Kushner to discuss strategy concerning Perkins Eastman's failure to respond.	ARCH
82489.27817	02/22/2021	44	A	4	375.00	2.40	810.00	Review/analyze Dearth deposition transcript taking note of material testimony provided therein and conform same for service on A. Gill.	ARCH
82489.27817	02/24/2021	44	A	3	375.00	0.40	135.00	Draft/revise attendance sheet for submission to the Court and email corr. with all counsel requesting authority to submit same per Judge Woods' Rules.	ARCH
82489.27817	02/24/2021	7	A	1	620.00	0.10	55.80	Email to C. Rodriguez regarding compliance with Judge woods sign-in/teleconference protocols.	ARCH
82489.27817	02/24/2021	44	A	8	375.00	0.30	101.25	Communicate (other external) : Phone call with outside counsel to Perkins Eastman advising that a production of documents will be made shortly in response to the pending subpoena and that new counsel will be appearing for the 2/25/21 conference with Judge Woods.	ARCH
82489.27817	02/24/2021	44	A	4	375.00	1.70	573.75	Review/analyze correspondence and document production from Yuanda and cross-reference with	ARCH

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 28

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>								
							subpoena; EMail corr. and conf. with G. Kushner and D. Carbone regarding strategy on order to show cause and deposition of Mindy No.	
82489.27817	02/24/2021	44	A	3	375.00	0.60	202.50 Draft/revise appearance sheet for conference on Order to Show Cause to compel Perkins Eastman production; Revise per communication with new counsel to Perkins Eastman; Email corr. with A. Gill advising on new counsel and production; Email corr. with the Court confirming that Perkins Eastman will be appearing by new counsel.	ARCH
82489.27817	02/24/2021	44	A	6	375.00	0.70	236.25 Communicate (with client) : Call with James Dearth to distill how various engineering roles were divvied up among WSP, Perkins Eastman, Whitestone, and Yuanda in anticipation of preparing for the deposition of Mindy No of Perkins Eastman.	ARCH
82489.27817	02/24/2021	44	A	12	375.00	0.70	236.25 Plan and prepare for conference with the Court on Whitestone's Order to Show Cause to compel Perkins Eastman's production of documents and deposition; Conf. with G. Kushner to discuss strategy for conference with the Judge.	ARCH
82489.27817	02/24/2021	7	A	1	620.00	0.10	55.80 Conference with C. Rodriguez re: Perkins retention of outside counsel and production of documents.	ARCH
82489.27817	02/25/2021	44	A	9	375.00	0.80	270.00 Appear for/attend hearing on Whitestone's order to show cause to compel perkins eastman to produce documents in furtherance of its subpoena; Judge ultimately ordering the production of documents and reserving the application as to fees for a later date.	ARCH
82489.27817	02/25/2021	44	A	8	375.00	0.20	67.50 Communicate (other external) : Phone call with Adam Gill regarding availability for deposition on March 12th and sharing in costs.	ARCH
82489.27817	02/25/2021	44	A	5	375.00	0.20	67.50 Communicate (in firm) : Atty. conf. with G. Kushner advising on the outcome of the hearing on Whitestone's Order to Show Cause and strategy moving forward.	ARCH
82489.27817	02/25/2021	44	A	4	375.00	1.10	371.25 Review/analyze Perkins Eastman documents in preparation for deposition of Mindy No.	ARCH
82489.27817	02/25/2021	44	A	4	375.00	0.30	101.25 Review/analyze Order signed by Judge Woods setting forth Perkins Eastman's requirements for compliance with Whitestone's Subpoena.	ARCH
82489.27817	02/25/2021	52	A	4	365.00	0.20	73.00 Review/analyze Court Order on contempt motion against Perkins Eastman, calendar dates for conference call deadline	ARCH
82489.27817	02/25/2021	7	A	1	620.00	0.10	55.80 Telephone conference with C. Rodriguez re: update on Court ruling/Perkins motion to compel.	ARCH
82489.27817	03/05/2021	44	A	8	375.00	0.30	101.25 Communicate (other external) : Call w. Reporter to schedule life remote video deposition of Mindy No of Perkins Eastman.	ARCH
82489.27817	03/05/2021	44	A	8	375.00	0.40	135.00 Communicate (other external) : Email corr. with Adam Gill regarding deposition of Perkins Eastman; Review response from A. Gill requesting costs for Grzic deposition and coordination on exhibits to be introduced in the M. No deposition.	ARCH
82489.27817	03/05/2021	44	A	8	375.00	0.10	33.75 Communicate (other external) : Call with G. Kushner to address items needed for Perkins Eastman deposition.	ARCH
82489.27817	03/05/2021	44	A	6	375.00	0.20	67.50 Communicate (with client) : Email corr. and call with James Dearth regarding review of Perkins Eastman discovery.	ARCH
82489.27817	03/05/2021	44	A	4	375.00	1.30	438.75 Review/analyze Perkins Eastman discovery, seeking to identify communications and documents which may prove useful at deposition.	ARCH
82489.27817	03/08/2021	44	A	4	375.00	2.10	708.75 Review/analyze Perkins Eastman discovery to prepare for deposition of Mindy No.	ARCH



Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 29

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	03/08/2021	44	A	6	375.00	5.10	1,721.25	Communicate (with client) : Conference with James Dearth to review Perkins Eastman discovery in context of WT-3 clerestory alleged defect, procedure with Sciamé, and Perkins Eastman design omissions.	ARCH
82489.27817	03/08/2021	44	A	5	375.00	0.20	67.50	Communicate (in firm) : Conf. with D. Carbone regarding strategy moving forward with respect to Mindy No deposition.	ARCH
82489.27817	03/08/2021	44	A	5	375.00	0.20	67.50	Communicate (in firm) : Conf. with G. Kushner regarding strategy with respect to adjourning deposition with Judge.	ARCH
82489.27817	03/08/2021	6	A	1	650.00	0.25	146.25	telephone conference with Chris re: cancel Dr. No due to Covid; review of pertinent documents discovered; prep. bullet point, attach exhibits	ARCH
82489.27817	03/09/2021	44	A	8	375.00	0.30	101.25	Communicate (other external) : Phone call w. A. Gill regarding adjournment of Mindy No's deposition and outstanding issues concerning costs of same.	ARCH
82489.27817	03/09/2021	44	A	8	375.00	0.30	101.25	Communicate (other external) : Email corr. with A. Gill regarding deposition transcripts from S. Grzic and C. Tan depositions and logistics for certifying same.	ARCH
82489.27817	03/09/2021	44	A	8	375.00	0.90	303.75	Communicate (other external) : Phone call and email corr. with A. Acevedo re. Perkins Eastman discovery, adjourning M. No deposition, and pending application for costs.	ARCH
82489.27817	03/09/2021	44	A	8	375.00	0.20	67.50	Communicate (other external) : Phone call w. Veritext inquiring on status of C. Tan deposition transcript.	ARCH
82489.27817	03/09/2021	44	A	8	375.00	0.30	101.25	Communicate (other external) : Email corr. with A. Gill regarding logistics for deposition of Mindy No.	ARCH
82489.27817	03/09/2021	44	A	3	375.00	1.80	607.50	Draft/revise letter application to the Court requesting adjournment of Perkins Eastman deadlines due to exigent circumstances; Email corr. and phone call with all counsel concerning adjournment logistics; Atty conf. with G. Kushner addressing revisions to letter to Court; finalize and serve letter to Court and all counsel.	ARCH
82489.27817	03/09/2021	7	A	1	620.00	0.30	167.40	Multiple telephone conferences with C. Rodriguez re: Perkins' failure to produce documents; letter to Court to inform/new scheduling.	ARCH
82489.27817	03/09/2021	7	A	1	620.00	0.10	55.80	Review/edit proposed letter To Court re: discovery updates.	ARCH
82489.27817	03/10/2021	52	A	4	365.00	0.20	65.70	Review/analyze Order rescheduling case management deadlines; update calendar with new deadlines	ARCH
82489.27817	03/10/2021	44	A	4	375.00	0.40	135.00	Review/analyze Order signed by Judge Woods setting deadlines for Perkins Eastman discovery; email corr. to all counsel to serve pursuant to Order.	ARCH
82489.27817	03/10/2021	44	A	4	375.00	0.40	135.00	Review/analyze letter from Perkins Eastman responding to Judge's Order on discovery and response from the Court.	ARCH
82489.27817	03/10/2021	44	A	5	375.00	0.20	67.50	Communicate (in firm) : Atty. conf. with G. Kushner regarding response to Perkins Eastman.	ARCH
82489.27817	03/10/2021	44	A	8	375.00	0.40	135.00	Communicate (other external) : Email corr. with counsel to Perkins Eastman regarding allegation that document discovery is complete and requesting that same be certified by Perkins Eastman.	ARCH
82489.27817	03/10/2021	44	A	8	375.00	0.50	168.75	Communicate (other external) : Back and forth email correspondence with counsel to Perkins Eastman regarding their failure and/or refusal to turnover internal communications and documentation, informing them that same remains a violation of the Subpoena.	ARCH
82489.27817	03/10/2021	44	A	3	375.00	0.50	168.75	Draft/revise and file affidavit of service and serve order pursuant to the Court's instruction.	ARCH

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 30

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	03/10/2021	7	A	1	620.00	0.10	55.80	Fax new scheduling order from Judge Woods.	ARCH
82489.27817	03/11/2021	44	A	8	375.00	0.30	101.25	Communicate (other external) : Email corr. with counsel to Perkins Eastman regarding documents missing from Perkins Eastman production and representation from Perkins Eastman concerning documents produced.	ARCH
82489.27817	03/11/2021	44	A	4	375.00	0.20	67.50	Review/analyze Order from Court denying Perkins Eastman's request to limit Whitestone's ability to seek fees from Perkins Eastman.	ARCH
82489.27817	03/11/2021	44	A	5	375.00	0.30	101.25	Communicate (in firm) : Email corr. with D. Carbone and G. Kushner regarding strategy for Perkins Eastman document production.	ARCH
82489.27817	03/12/2021	7	A	1	620.00	1.50	837.00	Continue review/edits to discovery responses.	ARCH
82489.27817	03/15/2021	44	A	3	375.00	2.60	877.50	Draft/revise summary of key Perkins Eastman discovery for use at deposition of Mindy No.	ARCH
82489.27817	03/16/2021	44	A	4	375.00	3.60	1,215.00	Review/analyze Charles Tan deposition, noting any salient testimony.	ARCH
82489.27817	03/16/2021	44	A	8	375.00	0.30	101.25	Communicate (other external) : Email corr. with A. Gill providing notice of Mr. Tan's deposition transcript and requesting certification of same, also requesting copy of Grzic transcript.	ARCH
82489.27817	03/18/2021	44	A	8	375.00	0.40	135.00	Communicate (other external) : Email corr. and phone call with Adam Gill and Veritext regarding deposition transcript for Steven Grzic.	ARCH
82489.27817	03/18/2021	44	A	4	375.00	0.80	270.00	Review/analyze Perkins Eastman discovery and organize relevant documents into timeline.	ARCH
82489.27817	03/18/2021	44	A	8	375.00	0.20	67.50	Communicate (other external) : Email corr. with all counsel regarding logistics for deposition.	ARCH
82489.27817	03/19/2021	44	A	4	375.00	1.30	438.75	Review/analyze Grzic deposition transcript and marked exhibits.	ARCH
82489.27817	03/19/2021	44	A	3	375.00	1.70	573.75	Draft/revise timeline of salient facts cross-reference with timeline of Perkins Eastman exhibits; prepare notes for D. Carbone regarding salient documents and facts in preparation for Perkins Eastman deposition.	ARCH
82489.27817	03/29/2021	44	A	4	375.00	0.30	101.25	Review/analyze Grzic's signed deposition certification page; Email corr. with Adam Gill providing certified transcript.	ARCH
82489.27817	03/29/2021	44	A	4	375.00	1.20	405.00	Review/analyze and organize documents relevant to Perkins Eastman deposition.	ARCH
82489.27817	04/05/2021	6	A	1	650.00	1.10	643.50	receipt and review of Perkins Eastman docs. produced per subpoena	ARCH
82489.27817	04/06/2021	44	A	4	375.00	1.10	371.25	Review/analyze procedural history, deadlines, discovery, and court rulings to assess strategy and merits of pending claim, prepare summary thereof for Donald Carbone.	ARCH
82489.27817	04/06/2021	44	A	5	375.00	0.20	67.50	Communicate (in firm) : Call with D. Carbone to discuss preparation of deposition exhibits for Perkins Eastman deposition.	ARCH
82489.27817	04/07/2021	44	A	5	375.00	0.30	101.25	Communicate (in firm) : Atty conf. with D. Carbone regarding exhibits to be introduced at the Perkins Eastman deposition.	ARCH
82489.27817	04/07/2021	44	A	8	375.00	0.20	67.50	Communicate (other external) : Email corr. with counsel for Perkins Eastman regarding logistics for Mindy No's deposition.	ARCH
82489.27817	04/07/2021	44	A	4	375.00	0.30	101.25	Review/analyze procedural requirements for exhibits and logistics for Perkins Eastman deposition.	ARCH
82489.27817	04/07/2021	44	A	4	375.00	0.80	270.00	Review/analyze deposition exhibits from Grzic, Dearth, and Tan depositions to prepare items to be introduced during Mindy No deposition.	ARCH
82489.27817	04/07/2021	44	A	4	375.00	2.30	776.25	Review/analyze exhibits to be introduced during Perkins Eastman deposition, prepare for service on counsel pursuant to Court requirements.	ARCH
82489.27817	04/07/2021	44	A	8	375.00	0.30	101.25	Communicate (other external) : Email corr. with	ARCH



Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 31

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>								
							attorneys for Perkins Eastman and Yuanda regarding disclosure of exhibits in connection with deposition of Mindy No.	
82489.27817	04/07/2021	6	A	1	650.00	2.60	1,521.00 cont. review of EP documents for prep. for EBT of A/E No	ARCH
82489.27817	04/08/2021	44	A	5	375.00	0.20	67.50 Communicate (in firm) : Confer w. D. Carbone regarding logistics for Perkins Eastman deposition.	ARCH
82489.27817	04/08/2021	44	A	4	375.00	1.40	472.50 Review/analyze and compile exhibits for Perkins Eastman deposition; prepare deposition summary and reference tool for exhibits to utilize during questioning; email corr. with Veritext to provide electronic copies of exhibits.	ARCH
82489.27817	04/08/2021	44	A	5	375.00	0.20	67.50 Communicate (in firm) : Confer with G. Kushner regarding whether to renew application for sanctions and costs against Perkins Eastman.	ARCH
82489.27817	04/08/2021	44	A	8	375.00	0.30	101.25 Communicate (other external) : Email corr. with counsel to Perkins Eastman and Yuanda regarding deposition logistics.	ARCH
82489.27817	04/09/2021	6	A	1	650.00	3.50	2,047.50 prepare for deposition of Mindy No from Perkins Eastman	ARCH
82489.27817	04/21/2021	52	A	7	365.00	0.80	292.00 Communicate (other outside counsel): emails to Adam Gill Esq. regarding joint status report; review/revise proposed joint status report; emails regarding same regarding motion practice	ARCH
82489.27817	04/21/2021	44	A	5	375.00	0.20	67.50 Communicate (in firm) : Confer with B. Blum regarding revisions to joint-status letter and strategy concerning dispositive motion practice.	ARCH
82489.27817	04/21/2021	6	A	1	650.00	0.33	193.05 receipt and review of status letter to judge; inter-office conference with Ben re: changes	ARCH
82489.27817	04/21/2021	7	A	1	620.00	0.10	55.80 Conference with D. Carbone to follow up with compliance with status letter to Court.	ARCH
82489.27817	04/22/2021	52	A	3	365.00	1.10	401.50 Teleconference with D. Carbone regarding edits to proposed letter; revise joint status letter and forward to opposing counsel; further intraoffice correspondence re: edits/finalize same; file letter with Judge Woods	ARCH
82489.27817	04/22/2021	7	A	1	620.00	0.10	55.80 Conference with B. Blum to finalize joint status letter to Court.	ARCH
82489.27817	04/23/2021	44	A	4	375.00	1.30	438.75 Review/analyze Perkins Eastman deposition transcript.	ARCH
82489.27817	04/27/2021	52	A	3	365.00	0.30	109.50 Draft conference appearance sheet; forward same to Adam Gill Esq. for approval to file; file same with court	ARCH
82489.27817	04/27/2021	7	A	1	620.00	0.10	55.80 Email to A. Gill re: registration for 4/29 conference with Court.	ARCH
82489.27817	04/29/2021	44	A	4	375.00	0.20	67.50 Review/analyze Court Order adjourning conference.	ARCH
82489.27817	04/29/2021	7	A	1	620.00	0.10	55.80 Review and revise email from Court re: adjournment of conference to 5/6.	ARCH
82489.27817	05/05/2021	52	A	3	365.00	0.30	98.55 Draft revised telephonic appearance sheet; correspondence with opposing counsel requesting authority to submit same; file with court	ARCH
82489.27817	05/06/2021	7	A	1	620.00	0.30	167.40 Prepare for Court conference.	ARCH
82489.27817	05/06/2021	7	A	1	620.00	0.10	55.80 Telephone conference with A. Gill re: alteration in briefing schedule.	ARCH
82489.27817	05/06/2021	7	A	1	620.00	0.60	334.80 Attendance at Court hearing.	ARCH
82489.27817	05/06/2021	7	A	1	620.00	0.10	55.80 Email to D. Carbone re: status report.	ARCH
82489.27817	05/16/2021	7	A	1	620.00	0.10	55.80 Receive and review email from D. Carbone re: effect of App. Div. decision on District Court action.	ARCH
82489.27817	05/19/2021	6	A	1	650.00	4.60	2,691.00 receipt and review of Charles Tan deposition for prep. of motion for SJ; receipt and review of EBT of Steven Grzic	ARCH
82489.27817	05/21/2021	44	A	5	375.00	0.10	33.75 Communicate (in firm) : Conf. w. D. Carbone regarding post-deposition demands to be posited against Yuanda.	ARCH

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 32

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	05/21/2021	44	A	4	375.00	1.20	405.00	Review/analyze dispositive motion practice entered into in this action.	ARCH
82489.27817	05/21/2021	7	A	1	620.00	0.60	334.80	Receive and review transcripts from C. Rodriguez; prepare general outline for summary judgment arguments.	ARCH
82489.27817	05/26/2021	44	A	4	375.00	2.50	843.75	Review/analyze Court Orders, transcripts, prior motions, and pleadings in preparation for moving for summary judgment.	ARCH
82489.27817	05/26/2021	44	A	4	375.00	1.70	573.75	Review/analyze Charles Tan deposition transcript; Draft letter to Adam Gill demanding that Yuanda produce documents and information responsive to demands made during Tan deposition.	ARCH
82489.27817	05/26/2021	7	A	1	620.00	0.20	111.60	Draft letter to A. Gill re: summary judgment issue.	ARCH
82489.27817	05/26/2021	7	A	1	620.00	0.20	111.60	Email to C. Rodriguez re: preparation for summary judgment motion.	ARCH
82489.27817	05/27/2021	44	A	3	375.00	0.30	101.25	Revise letter to Gill regarding Tan Deposition Demands; Email corr. with Gill serving letter concerning outstanding demands placed upon Tan during his deposition.	ARCH
82489.27817	06/01/2021	44	A	5	375.00	0.10	33.75	Communicate (in firm) : Confer w. G. Kushner regarding next steps in preparing for dispositive motion practice, deadlines, and Judge's request that parties confer to establish a single motion timeline.	ARCH
82489.27817	06/01/2021	44	A	4	375.00	0.70	236.25	Review/analyze pleadings, orders, procedural posture, and briefings to construct overview of case status and prepare analysis for next steps in the action.	ARCH
82489.27817	06/01/2021	7	A	1	620.00	0.20	111.60	Draft, edit and finalize letter to Judge Woods re: update on Sciamé decision.	ARCH
82489.27817	06/04/2021	7	A	1	620.00	0.10	55.80	Finalize and file status letter with Court.	ARCH
82489.27817	06/07/2021	44	A	8	375.00	0.30	101.25	Communicate (other external) : Email corr. with A. Gill following-up on demand for responses to the discovery demands posited during Mr. Tan's deposition.	ARCH
82489.27817	06/08/2021	44	A	4	375.00	0.50	168.75	Review/analyze Yuanda's response to demands posited during the deposition of Charles Tan.	ARCH
82489.27817	06/08/2021	7	A	1	620.00	0.20	111.60	Receive and review email from A. Gill with detailed information/responses to deposition open items.	ARCH
82489.27817	06/09/2021	6	A	1	650.00	0.10	58.50	receipt and review of Yuanda atty. response to supplemental disclosure	ARCH
82489.27817	06/11/2021	52	A	5	365.00	0.80	262.80	Communicate (in firm): intraoffice conference with G. Kushner regarding pre-motion conference request; review adam gill esq. letter/draft response to same setting forth GMK will submit a more formal response next week	ARCH
82489.27817	06/11/2021	44	A	4	375.00	0.30	101.25	Review/analyze letter corr. from Yuanda seeking an early pre-summary judgment conference in an effort to accelerate the summary judgment timeline.	ARCH
82489.27817	06/11/2021	7	A	1	620.00	0.20	111.60	Receive and review letter from A. Gill to Judge Woods re: request for conference.	ARCH
82489.27817	06/11/2021	7	A	1	620.00	0.10	55.80	Conference with B. Blum re: prepare response to Gill letter.	ARCH
82489.27817	06/11/2021	7	A	1	620.00	0.10	55.80	Receive and review email from Court denying Gill's request for a conference.	ARCH
82489.27817	06/18/2021	44	A	4	375.00	1.10	371.25	Review/analyze Yuanda responses to Whitestone discovery demands made during the Tan deposition; Phone call and email corr. w. D. Carbone concerning further discovery.	ARCH
82489.27817	06/22/2021	6	A	1	650.00	2.10	1,228.50	review of James Dearth e-mail re: motion for SJ	ARCH
82489.27817	06/25/2021	16	A	1	495.00	0.80	356.40	Research authority re summary judgment decisions entered by Judge Woods. Corr. with GMK re same.	ARCH
82489.27817	06/25/2021	7	A	1	620.00	2.00	1,116.00	Start drafting summary judgment application.	ARCH
82489.27817	06/28/2021	16	A	1	495.00	0.70	311.85	Research authority re summary judgment decisions on breach of contract cases entered by Judge	ARCH

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 33

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>									
82489.27817	06/28/2021	7	A	1	620.00	1.00	558.00	Woods. Corr. with GMK re same.	
82489.27817	06/28/2021	6	A	1	650.00	0.75	438.75	Continue research and preparation for motion for summary judgment.	ARCH
82489.27817	06/29/2021	44	A	4	375.00	0.80	270.00	cont. review of James Dearth deposition transcript - in context of motions for SJ	ARCH
82489.27817	06/29/2021	7	A	1	620.00	1.00	558.00	Review/analyze pleadings and motion exhibits to prepare for summary judgment; Conf. w. G. Kushner regarding dispositive motion practice.	ARCH
82489.27817	06/30/2021	6	A	1	650.00	0.75	438.75	Review, prepare abstract of Grzic deposition for use in motion for summary judgment.	ARCH
82489.27817	06/30/2021	6	A	1	650.00	0.20	117.00	review of depo. transcripts/exhibits re: roof deflection issue; inter-office conference with GK re: points for motion for summary judgment	ARCH
82489.27817	06/30/2021	7	A	1	620.00	4.50	2,511.00	inter-office conference with GK re: deflection of buildings AOR design drawings vs. 5300 and new calculations after the fact	ARCH
82489.27817	07/01/2021	44	P	4	375.00	1.20	450.00	Continue to review Grzic deposition transcript/prepare summary judgment motion.	421
82489.27817	07/01/2021	6	P	1	650.00	0.93	604.50	Review/analyze deposition transcript of Charles Tan and deposition exhibits to prepare same for dispositive motion practice.	456
82489.27817	07/02/2021	7	P	1	620.00	0.30	186.00	review of PO with eye toward key provisions for motion for summary judgment	426
82489.27817	07/06/2021	16	P	1	495.00	4.10	2,029.50	Preliminary review oft filed motion for summary judgment/Yuanda motion.	428
82489.27817	07/06/2021	7	P	1	620.00	1.50	930.00	Analyze Yuanda purchase order for definition of measure of damages. Research authority upholding such damages in the context of a breach of contract action. Analyze Yuanda's motion for summary judgment and Rule 56.1 statement. Research authority rejecting Yuanda's calculation of damages. Draft email memorandum to GMK re same.	436
82489.27817	07/07/2021	7	P	1	620.00	2.50	1,550.00	Continue work on drafting summary judgment motion.	437
82489.27817	07/07/2021	7	P	1	620.00	0.20	124.00	Continue preparation of memo of law re: summary judgment motion.	438
82489.27817	07/07/2021	7	P	1	620.00	0.30	186.00	Conference with D. Carbone to discuss legal argument to support summary judgment motion.	439
82489.27817	07/07/2021	7	P	1	620.00	0.10	62.00	Conference with S. Simon to discuss/develop legal arguments re: motion for summary judgment.	440
82489.27817	07/07/2021	7	P	1	620.00	0.30	186.00	Email to A. Gill re: cross-motion/comment.	441
82489.27817	07/07/2021	6	P	1	650.00	0.75	487.50	Draft, edit and finalize letter to Court re: request for authority to file cross-motion.	457
82489.27817	07/08/2021	16	P	1	495.00	5.30	2,623.50	inter-office conference with GK re: applicable language - motion for SJ; receipt and review of PO re: definition Vendor's Work, motion for SJ	429
82489.27817	07/08/2021	7	P	1	620.00	1.50	0.00	Conf. with DJC and GMK re opposition to Yuanda's MSJ. Revisions to same.	442
82489.27817	07/08/2021	7	P	1	620.00	3.50	2,170.00	Conference with D. Carbone and S. Simon to discuss arguments in support of summary judgment motion (1.50). (No charge).	443
82489.27817	07/08/2021	6	P	1	650.00	1.50	975.00	Continue work on summary judgment motion, preparation of Rule 56.1 statement.	458
82489.27817	07/09/2021	16	P	1	495.00	5.50	2,722.50	inter-office conference with GK/Scott re: particular wording in PO to be used in cross-motion SJ	430
82489.27817	07/09/2021	52	P	4	365.00	0.20	73.00	Continue drafting memorandum of law in support of motion for summary judgment. Conf. with GMK re same.	431
82489.27817	07/09/2021	7	P	1	620.00	0.20	124.00	Review/analyze court minute order; calendar dates	444
82489.27817	07/09/2021	7	P	1	620.00	0.40	248.00	Telephone conference with A. Gill to discuss revisions in schedule for summary judgment motion.	445
82489.27817	07/09/2021	7	P	1	620.00	0.70	434.00	Prepare, edit and finalize letter to Court with request for adjournment to briefing schedule.	454
82489.27817	07/09/2021	7	P	1	620.00	0.70	434.00	Review, revise first draft of preliminary	454

Date: 07/21/2021

**Detail Fee Transaction File List**  
GOETZ FITZPATRICK LLP

Page: 34

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
<b>Client ID 82489.27817 Whitestone Construction, Corp.</b>								
							statement/memo of law in support of summary judgment motion.	
82489.27817	07/12/2021	16	P	1	495.00	5.50	2,722.50 Draft notice of cross-motion. Continue drafting memorandum of law in support of cross-motion. Corr. with GMK re same.	432
82489.27817	07/12/2021	7	P	1	620.00	0.20	124.00 Conference with S. Simon re: analysis of damages.	446
82489.27817	07/12/2021	7	P	1	620.00	1.50	930.00 Continue review of deposition transcripts.	447
82489.27817	07/12/2021	7	P	1	620.00	1.00	620.00 Review, edit second draft of MOL.	448
82489.27817	07/13/2021	16	P	1	495.00	5.80	2,871.00 Analyze GMK markup to memorandum of law. TC with GMK re same. Revise structure and contents of MOL in accordance with GMK instructions.	433
82489.27817	07/13/2021	7	P	1	620.00	0.60	372.00 Conference with S. Simon to discuss legal arguments in first draft of memo of law in support of summary judgment motion.	451
82489.27817	07/14/2021	16	P	1	495.00	3.00	1,485.00 Revisions to Memorandum of Law in support of summary judgment motion. Multiple TCs and corr. with GMK re same.	434
82489.27817	07/14/2021	7	P	1	620.00	1.00	620.00 Review and edit second drafting of MOL re: summary judgment.	452
82489.27817	07/14/2021	7	P	1	620.00	1.50	930.00 Continue review of file documents for preparation of Rule 56.1 statement.	453
82489.27817	07/15/2021	16	P	1	495.00	4.30	2,128.50 Further revisions to memorandum of law in support of cross-motion. TC and corr. with GMK re same. Corr. with DJC re same. Draft response to Yuanda's Local Rule 56.1 Statement of Undisputed Facts.	435
82489.27817	07/15/2021	7	P	1	620.00	0.80	496.00 Review, edits to second draft of MOL.	449
82489.27817	07/16/2021	7	P	1	620.00	1.00	620.00 Continue preparation and edits to Whitestone Rule 56.1 statement.	450
82489.27817	07/19/2021	16	P	1	495.00	4.50	2,227.50 Revisions to brief in support of cross-motion. Revisions to Rule 56.1 statement. Conf. with GMK re same.	455
82489.27817	07/19/2021	7	P	1	620.00	1.50	930.00 Continued working on Whitestone Rule 56.1 Statement.	459
82489.27817	07/19/2021	7	P	1	620.00	0.10	62.00 Review DJC comments to memo of law.	461
82489.27817	07/19/2021	7	P	1	620.00	0.30	186.00 Review, edit first draft of Rule 56.1 counterstatement.	460
82489.27817	07/20/2021	16	P	1	495.00	1.00	495.00 Revisions to brief in support of cross-motion. Revisions to Rule 56.1 statement. Conf. with GMK re same.	462
82489.27817	07/21/2021	16	P	1	495.00	1.00	495.00 Analyze docket and billing records. Draft section of GMK Declaration regarding entitlement to legal fees.	463

<b>Total for Client ID 82489.27817</b>				Billable	587.33	273,287.53	Whitestone Construction, Corp.
				Non-billable	16.43	6,039.60	Yuanda
				Total	603.76	279,327.13	

**GRAND TOTALS**

Billable	587.33	273,287.53
Non-billable	16.43	6,039.60
Total	603.76	279,327.13